# PERKINSCOIE RÉCEIVED

2015 DEC 22 PM 4: 18

700 13th Street, NW Suite 600 Washington, D.C. 20005-3960 +1.202.654.6200
 +1.202.654.6211
 PerkinsCoie.com

December 22, 2016

Jeff S. Jordan
Assistant General Counsel
Federal Election Commission
Office of Complaints Examination and Legal Administration
999 E Street, NW
Washington, DC 20463

Re: MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188

Dear Mr. Jordan:

In response to the complaints filed by the Foundation for Accountability and Civic Trust ("FACT" or the "Complainant"), we write as counsel to DCCC and Kelly Ward in her official capacity as treasurer in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7178, 7179, 7182, 7187, and 7188 (collectively, the "Complaints"); Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer, in MUR 7169; Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7170; Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity as treasurer, in MUR 7171; Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7172; Applegate for Congress and Douglas Applegate, in his official capacity as treasurer, in MUR 7173; Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer, in MUR 7174; Texans for Pete and Wayne Alexander, in his official capacity as treasurer, in MUR 7175; Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7176; Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer, in MUR 7177; Eggman for Congress and Jay Petterson, in his official capacity as treasurer, in MUR 7178; Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7179; Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer, in MUR 7182; Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer, in MUR 7187; and LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer, in MUR 7188 (collectively, "Respondents" and individually, each a "Respondent").

## INTRODUCTION

These Complaints involve advertisements paid for by the DCCC that supported the election of the named Democratic congressional candidates, and that also opposed the

election, actions, or policies of Donald J. Trump, the Republican candidate for President. The Complaints present three legal issues, none of which is new or complicated: (1) whether the DCCC properly attributed the costs of the advertisements among the multiple candidates appearing in them according to 11 C.F.R. § 106.1(a); (2) whether the DCCC correctly accounted for the portion of the expenses attributed to Donald Trump; and (3) whether the DCCC and the congressional campaigns refrained from coordinating the ads with Hillary for America ("HFA"), so that none of their costs would represent in-kind contributions to HFA.

Because the answer to each of these questions is yes, there is no reason to believe Respondents violated the Federal Election Campaign Act of 1971, as amended (the "Act") or the regulations of the Federal Election Commission (the "FEC" or "Commission"):

First, the DCCC followed the process mandated by Commission regulations and long-standing Commission authority and attributed the cost of the advertisements among the multiple candidates appearing in them on a time-space basis, "according to the benefit reasonably expected to be derived." The Complaints ignore clear Commission authority requiring attribution among multiple candidates in this case of advertisements like these and present no facts to show that any attribution was done incorrectly. Instead, relying solely on one inaccurate news article, they simply assume that the advertisements were misattributed under the concept of "hybrid advertising" based on a generic party reference, which was not the case. These advertisements simply present a text book example of appropriately attributing expenditures under 11 C.F.R. § 106.1(a).

Second, the facts show that the DCCC correctly accounted for and reported the expenses attributable to Donald Trump. Some of the advertisements expressly advocated Trump's defeat, while others did not. The first were reported as independent expenditures, while the second were not, according to the Act and Commission regulations.<sup>3</sup>

Moreover, as a national party committee, the DCCC had an interest both in urging Donald Trump's defeat and criticizing his policies, above and beyond its central mission of supporting House candidates. Donald Trump was at the top of the ticket and the face of the Republican Party. He advocated policies and took actions strongly opposed by Democratic Party adherents. By expressly advocating Donald Trump's defeat, and by criticizing policy positions he espoused, that were strongly identified with him in the public mind, the DCCC alternatively promoted his defeat and mobilized Democratic opposition to his policies, the latter of which also helped support the ticket as a whole.

Third, none of the advertisements at issue was coordinated with HFA. In fact, the DCCC and campaigns took specific steps to avoid coordination with HFA. The Complaints present no facts to support any claim of coordination, but simply assume that it must have

<sup>1 11</sup> C.F.R. § 106.1(a)(1).

<sup>&</sup>lt;sup>2</sup> See Scott Bland, Dems use loophole to pump millions into fight for the House, Politico, Oct. 18, 2016, http://www.politico.com/story/2016/10/democrats-house-campaign-money-229957.

<sup>&</sup>lt;sup>3</sup> See 11 C.F.R. § 100.16(a) (linking definition of "independent expenditure" to express advocacy).

occurred because a party committee was involved in the advertisements—a presumption that the Supreme Court struck down long ago.<sup>4</sup>

The only factor that makes the resolution of these matters in any way complicated is the Complainant itself. As it has done before, FACT has flooded the Commission with fourteen complaints involving a wide array of respondents, in a clear effort to drain Respondents' resources and burden the Commission, with the ultimate effect of chilling speech and impeding the progress of other, non-frivolous enforcement matters. FACT relied on a single news article to "support" its conclusory allegations and focused the entire Complaints on generic party hybrid advertising that never occurred. The Complaints even carelessly swept up two ads that were attributed entirely to the relevant House campaigns and paid for completely with campaign funds and with coordinated party expenditure authority.

The Respondents complied with longstanding Commission regulations to support and oppose multiple candidates and promote the party as a whole. Because the costs were correctly attributed among multiple candidates, because the ads were correctly reported, and because there was no prohibited coordination with HFA, there is no reason to believe that any violation occurred, and the FEC should immediately dismiss these Complaints.

## **FACTS**

The DCCC is the House campaign committee of the Democratic Party.<sup>6</sup> Its principal mission is to support Democratic congressional candidates and other candidates around the country. In 2016, as before, a key part of the DCCC's activities involved financing television advertisements. Under Commission rules, the legal treatment of these advertisements varies by content—for example, whether they identify clearly identified candidates and, if so, how many; whether they expressly advocate the candidates' election or defeat; and whether they are coordinated with those candidates. The DCCC has had a long history of not simply making coordinated expenditures in support of House campaigns, but using communications to promote the interests of the Democratic Party as a whole.<sup>7</sup>

The presidential candidacy of Donald Trump provided the DCCC with a unique opportunity to promote Democratic House candidates, oppose Trump's election, and mobilize the Democratic Party against Trump's positions for the benefit of the whole ticket. Trump was a major issue in House campaigns, his defeat was a vital concern for Democratic adherents, and fighting back against his policy positions and actions was important to the party as a whole. The DCCC saw the opportunity to pursue all three of these objectives.

<sup>&</sup>lt;sup>4</sup> See Colorado Republican Fed. Campaign Comm. v. FEC, 518 U.S. 604, 614-15 (1996) (invalidating prohibition on party independent expenditures); McConnell v. FEC, 540 U.S. 93, 214 (2003), overruled in part on other grounds by Citizens United v. FEC, 558 U.S. 310 (2010) (invalidating requirement that party choose between making independent or coordinated expenditures).

<sup>&</sup>lt;sup>5</sup> See FEC MUR 6916, First General Counsel's Report (Oct. 22, 2015).

<sup>&</sup>lt;sup>6</sup> See, e.g., 11 C.F.R. § 110.2(c)(2)(ii).

<sup>&</sup>lt;sup>7</sup> See, e.g., FEC Advisory Opinion 1985-14 (DCCC).

These Complaints are about advertisements that the DCCC undertook in service of these multiple objectives. Supervised by a senior DCCC employee, DCCC staff worked with House campaigns to develop and produce the advertisements beginning with script development through the advertising buying phase. 8 Each of the advertisements involved explicit references to clearly identified House candidates and a clearly identified discussion of Donald Trump and were accounted for according to the following model:

- Some of the advertisements expressly advocated the defeat of both the Republican House candidate and Trump. (e.g., "Vote No on [Republican congressional candidate] and Donald Trump"). In these cases, the DCCC paid for and reported the portion of the advertisement attributable to Trump as an independent expenditure opposing him. The remainder was either paid entirely by the Democratic congressional campaign, or split between the campaign and the DCCC, with the DCCC treating its share of the remainder as a coordinated expenditure. Advertisements that included express advocacy against Donald Trump are discussed in MURs 7169, 7170, 7171, 7174, 7176, and 7182.10
- Other ads mentioned both House candidates and Donald Trump, but did not expressly advocate Trump's defeat. Rather, these ads focused on Trump's positions on key issues like national security, immigration, women's health, or gun control and his actions causing unrest and harm to the country. In these cases, the portion of the advertisements that concerned congressional candidates was either paid in whole by the Democratic House campaign, or split between the campaign and the DCCC using funds available under the coordinated party expenditure limits.11 The remainder was paid for by the DCCC and reported as an operating expense. The ads that did not expressly advocate Trump's defeat are discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188.12

In all of these advertisements, the DCCC attributed the relevant expenses between the referenced candidates—i.e., the House candidate and Donald Trump—on a time/space basis,

11 See Exhibit B.

<sup>&</sup>lt;sup>8</sup> See Exhibit A (affidavit of Michael Ian Russell)..

<sup>&</sup>lt;sup>9</sup> See Exhibit B (relevant pages of FEC reports).

The advertisement in MUR 7169 can be found here: https://www.youtube.com/watch?v=7inb2DsowG00. The advertisement in MUR 7170 can be found here: https://www.youtube.com/watch?v=ulkmwN7ivMU. The advertisement in MUR 7171 can be found here: https://www.youtube.com/watch?v=LS-gU95vm9U. The advertisement in MUR 7174 can be found here: https://www.youtube.com/warch?v=g\_4kBiw8r-U. The advertisement in MUR 7176 can be found here: https://www.youtube.com/watch?v=WCx3ObETyrE. The advertisement in MUR 7182 can be found here: https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

<sup>12</sup> The advertisement in MUR 7172 can be found here: https://www.youtubc.com/watch?v=nwdljKSaFdQ. The advertisement in MUR 7175 can be found here: https://www.youtube.com/watch?v=GJCZwJ3tYXw. The advertisement in MUR 7177 can be found here:

https://www.youtube.com/watch?v=7KxcnucjChU&feature=youtu.be. The advertisement in MUR 7178 can be found here: https://www.youtube.com/watch?v=HIxNUxf-t80. The advertisement in MUR 7179 can be found here: https://www.youtube.com/watch?v=OpdllznhrF4. The advertisement in MUR 7188 can be found here: https://www.youtube.com/watch?v=epFwW3WyQWo. For the advertisement in MUR 7177, the Colorado Democratic Party similarly split the costs of the advertisement with Carroll for Colorado on a time/space basis.

determining the portion of each ad that related to each candidate and allocating accordingly. As mentioned above, two of the Complaints involved ads that were paid for entirely with campaign funds, and with DCCC funds used under the coordinated party expenditure limit. 13

All of the advertisements discussed in the Complaints were conceived and executed by the DCCC independently of HFA or its agents. 14 Because the ads would refer to Trump, the staff and campaigns were instructed not to coordinate them with HFA or its agents. 15 The Complaints make no specific allegation of coordination whatsoever, and the declarations accompanying this response demonstrate the absence of any request, suggestion, assent, substantial discussion or material involvement. 16 The declarations demonstrate also that there was no coordination through any common vendor, former employee or independent contractor. 17

## LEGAL ANALYSIS

- I. The Costs of the Advertisements Were Properly Attributed Among Multiple Candidates According to the Benefit Reasonably Expected to Be Derived
  - A. Commission rules clearly provide for attribution among multiple candidates.

11 C.F.R. § 106.1(a) provides that "expenditures, including in-kind contributions, independent expenditures, and coordinated expenditures made on behalf of more than one clearly identified Federal candidate shall be attributed to each such candidate according to the benefit reasonably expected to be derived."18 For a television ad, the regulation is explicit about how to make this attribution: it "shall be determined by the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates."19 The Commission has repeatedly and consistently applied this regulation when evaluating communications that refer to multiple candidates.<sup>26</sup> For example, when an advertisement identifies candidates in multiple races, the expenditure is attributed based on the time/space dedicated to each race (e.g., the time dedicated to advocating a congressional candidate and her opponent would be attributed separately from the time spent advocating for a presidential candidate).<sup>21</sup> The portions of the broadcast communication that is dedicated to the legally

<sup>13</sup> The advertisement in MUR 7173 can be found here: https://www.youtube.com/watch?v=RriiljNAe-1. The advertisement in MUR 7187 can be found here: https://www.youtube.com/watch?v=8DNOEgLEECA. See Exhibit

B.

14 See Exhibit A.

<sup>16</sup> Id.; see also Exhibit C (affidavit of media vendors).

<sup>&</sup>lt;sup>17</sup> The vast majority of vendors working on the ads at issue in these matters did not work for HFA. Two vendors who did work on two different advertisements also did work for HFA but did not use any non-public information about HFA's plans, projects, activities, or needs in working on the advertisement. See Exhibit C.

<sup>&</sup>lt;sup>18</sup> 11 C.F.R. § 106.1(a).
<sup>19</sup> *Id.* 

<sup>&</sup>lt;sup>20</sup> See FEC Adv. Op. 2010-10 (NRL PAC); FEC Adv. Op. 2004-37 (Waters) ("attribution shall be determined by the proportion of space devoted to each candidate") (citing 11 C.F.R. § 106.1(a)(1)). <sup>21</sup> FEC Adv. Op. 2010-10 (NRL PAC).

required disclaimer and "stand by your ad" messages do not count for either candidate, but rather are split proportionately to the rest of the communication's content.<sup>22</sup>

In attributing the cost of a communication among multiple candidates, the Commission does not look to whether or not the segment associated with a particular candidate contains express advocacy. For example, in Advisory Opinion 2004-01, issued to Bush-Cheney '04, Inc. and Alice Forgy Kerr for Congress, the Commission understood that the ad would "not mention or refer to the President's candidacy for re-election [or] expressly advocate the election nor defeat of any presidential candidate." Still, the Commission confirmed that the costs of the communication must be attributed between the two campaigns based on the proportion of space or time devoted to each candidate under 11 C.F.R. § 106.1(a), even though the ad expressly advocated one candidate's election and not the other's. Similarly, in Advisory Opinion 2010-10, the Commission held that when a broadcast communication expressly advocated the election of one candidate, referred to an opposing candidate without expressly advocating defeat, and expressly advocated the election of a third candidate in an altogether different race, the references to the opposing candidate would be attributed to the first candidate under 11 C.F.R. § 106.1(a).<sup>25</sup>

The Commission has applied section 106.1's attribution principles even when only one candidate is referenced but the ad concerned multiple purposes. For example, in Advisory Opinion 2004-29, the Commission allowed Representative Todd Akin to appear in an ad supporting a ballot issue committee, but advised his campaign only to "reimburse the sponsor of the advertisement for the attributable portion of the cost of these coordinated communications," despite the fact that no candidate besides Akin would appear in the ad. 26 And in Advisory Opinion 2006-11, the Commission considered a state party mailing that would expressly advocate for a federal candidate and for other generically referenced candidates of the party committee. 27 The Commission held that, while no less than 50% of the costs could reasonably be attributed to the one identified candidate, "it is appropriate to apply analogous 'space or time' principles set out in 11 C.F.R. 106.1(a)" and that "the benefit reasonably expected to be derived' by the clearly identified candidate should be

<sup>&</sup>lt;sup>22</sup> Specifically, the Commission has advised that the disclaimer component of the communication should be attributed among the candidates or purposes "in the same proportion as the time or space" devoted to each race or purpose. FEC Adv. Op. 2010-10 (NRL PAC) at 6; see also FEC Adv. Op. 2007-09 (Kerry-Edwards) (permitting disclaimer to be attributed among multiple purposes). For instance, in NRL PAC, the FEC stated that, where 16 seconds of a 30-second advertisement are devoted to advocating for a presidential candidate, 8 seconds are devoted to advocating against a Senate candidate, and 6 seconds are devoted to a disclaimer, two-thirds of the expenditure should be reported as having been made in support of the presidential candidate and one-third should be reported as having been made in opposition to the Senate candidate. FEC Adv. Op. 2010-10 at 6 n.7. In Kerry-Edwards, the Commission found that the portion of broadcasting costs incurred by the Kerry-Edwards Campaign in complying with disclaimer requirements were expenses that may be paid for with legal funds. See FEC Adv. Op. 2007-09.

<sup>23</sup> FEC Adv. Op. 2004-01 (Bush/Kerr).

<sup>&</sup>lt;sup>24</sup> Id. at 6. The Commission has since adopted a specific exemption from the coordination rules that vitiates the general attribution rule in the case of certain "endorsement" ads. See 11 C.F.R.§ 109.21(g). However, that exception is not at issue in these matters.

<sup>&</sup>lt;sup>25</sup> FEC Adv. Op. 2010-10 (NRL PAC).

<sup>&</sup>lt;sup>26</sup> FEC Adv. Op. 2004-29 (Akin) at 6.

<sup>&</sup>lt;sup>27</sup> FEC Adv. Op. 2006-11 (Washington Democratic State Central Committee).

measured by determining the amount of space devoted to the clearly identified candidate as compared to the amount of space devoted to the generically referenced party candidates."28

Although the ads aired by Respondents are not so-called "hybrid" ads like those in Advisory Opinion 2006-11, the Commission has nonetheless found that ads that concern candidates, issues, and the party generally are allocated just like ads that concern multiple candidates. The Act "generally permit[s] (and in some cases require[s]) the allocation of expenses attributable to more than one purpose" and "allocation is an appropriate way to fund activities with multiple purposes" as held over and over by the Commission.<sup>29</sup> These ads that— in each case—referred to two candidates in two different elections, sometimes expressly advocating Trump's defeat and sometimes opposing his policy positions, were allocated in accordance with these longstanding Commission interpretations.

#### В. Respondents attributed the advertisements correctly.

The advertisements in MURs 7169, 7170, 7171, 7172, 7174, 7175, 7176, 7177, 7178, 7179, 7182, and 7188 were all correctly attributed among the Democratic House candidates and Donald Trump, just as 11 C.F.R. § 106.1(a) and Commission authority contemplate. The plain language of 11 C.F.R. § 106.1(a) requires that when an expenditure for a broadcast communication clearly identifies more than one Federal candidate, the costs shall be attributed as determined by "the proportion of space or time devoted to each candidate as compared to the total space or time devoted to all candidates." The FEC has additionally confirmed that when an advertisement mentions two opponents running for the same office and a third candidate for a different office, the costs are "allocated among the electoral races, based on a time or space analysis."30 This is how Respondents attributed the costs of these advertisements in this case.

All of the ads at issue referred to clearly identified House candidates and Donald Trump, a clearly identified presidential candidate running. The portions of the ads that were spent discussing the House candidates were attributed to the Democratic House candidate. Conversely, the portions of the ads that were spent discussing Trump were attributed to Trump. If a portion of an ad concerned both the House candidate and Trump, that period of time was attributed between the two races on a reasonable basis. The portion of each ad that was spent displaying the written, visual, and spoken disclaimer as mandated by law was allocated between the two races "in the same proportion as the time or space" devoted to each race in the other portions of the ad, just as the Commission instructed in Advisory Opinion 2010-10.

<sup>&</sup>lt;sup>29</sup> See FEC Adv. Op. 2010-14 (DSCC) (approving allocation of expense between campaign and recount activities); see also FEC Adv. Op. 1988-06 (Gore for President) (holding that "expenditures within the purview of the Act may be made for multiple purposes [and] the Commission believes that expenditures to run an advertisement which includes a fundraising solicitation may be allocated on a 'reasonable basis'"); First General Counsel's Report at 22, FEC Matter Under Review 4131(holding that multi-purpose mailers that include express advocacy of candidates and a solicitation for contributions to a state PAC should be allocated between the mixed purposes). <sup>30</sup> FEC Adv. Op. 2010-10 (NRL PAC).

Take, for example, the advertisement sponsored by the DCCC and Mowrer for Iowa at issue in MUR 7174.31 The advertisement contains express advocacy against Representative David Young and Donald Trump. The advertisement criticizes the positions of both Trump and Young and ends by saying, "Vote No on Donald Trump and David Young." The ad starts with approximately 5 seconds concerning Donald Trump and is followed by 4 seconds attributable to the House race, 5 seconds attributable to Trump, 4 seconds attributable to the House race, 3 seconds attributable to Trump, 5 seconds attributable to the House race, and finally 4 seconds containing the legally required disclaimer. The first 26 seconds of the advertisement were equally divided between the congressional race and Donald Trump and the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion. The advertisement was attributed 50% to the Mowrer campaign and 50% to Donald Trump.

Consider also the ad sponsored by the DCCC and Colleen Deacon for Congress at issue in MUR 7172.32 The ad critiques the positions of both Rep. John Katko and Donald Trump, but does not expressly advocate Trump's defeat. The ad starts with approximately 4 seconds equally attributable to both the House race and Trump and is followed by 2.5 seconds attributable to Trump, 3.5 seconds attributable to the House race, 8 seconds attributable to Trump, 7 seconds attributable to the House race, 3 seconds equally attributable to both the House race and Trump, and ends with 2 seconds dedicated to the disclaimer. The first 28 seconds of the advertisement were equally divided between the House race and Trump, the portion of the advertisement spent dedicated to the disclaimer was split on the same proportion, and so the advertisement was attributed 50% to the Deacon campaign and 50% to Trump. The same methodology was used to attribute the ads generally, and the Complaints provide no basis to question Respondents' attribution.

#### C. The expenses attributed to the House candidates were correctly reported.

The portion of the ads attributable to the House candidates were paid for and reported as required by the Act and Commission regulations. In almost every case, and as reported to the Commission, the relevant Democratic House campaign directly paid the relevant media vendor for its attributable portion of the costs. In two cases—the ad sponsored by the DCCC and Nelson for Wisconsin in MUR 7171, and the ad sponsored by the DCCC and Shkreli for Congress in MUR 7176—the DCCC paid for some of the portion of the expenses that were attributable to the House campaign as a coordinated expenditure. For the Nelson campaign, the DCCC paid \$33,700 of the costs attributable to the campaign, and for the Shkreli ad, the DCCC paid \$52,960. These payments were well within the DCCC's coordinated party expenditure limits for each race and were reported to the Commission.<sup>33</sup> The Commission has repeatedly held that when a federal campaign pays for the portion of an advertisement

<sup>&</sup>lt;sup>31</sup> Jim Mowrer, *Now We Understand*, YouTube (Oct. 19, 2016), https://www.youtube.com/watch?v=g\_4kBjw8r-U. <sup>12</sup> Colleen Deacon, *Unsettled*, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0. <sup>33</sup> See Exhibit B.

that is attributable to the relevant candidate under 11 C.F.R. § 106.1(a), no contribution results from the payment of the remaining portion of the expenses for the advertising.<sup>34</sup>

Contrary to FACT's speculative and unfounded allegations, the DCCC did not make any excessive contributions to any of the House campaigns, because the expenses attributable to those campaigns were either paid for by the campaigns themselves, or by the DCCC under its coordinated expenditure authority.

D. Two of the communications at issue were paid for entirely by the House campaigns and the DCCC as coordinated party expenditures.

For reasons known only to FACT, that organization filed two complaints regarding ads paid for entirely by the relevant Democratic House campaign and under the DCCC's coordinated party expenditure authority. Given the way that they were funded, these expenditures for these ads cannot possibly amount to excessive contributions from the DCCC to the House campaign. MUR 7173 concerns an ad sponsored by the DCCC and Applegate for Congress. The DCCC spent a total of \$91,200 to assist in the airing of this ad and Applegate for Congress paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward the ad were treated as coordinated party expenditures and reported accordingly.35

Similarly, MUR 7187 concerns an advertisement sponsored by the DCCC and Friends of Christina M. Hartman. The DCCC spent a total of \$96,070 to assist in the airing of this ad and Friends of Christina M. Hartman paid for all other expenses associated with its creation and airing. The funds spent by the DCCC toward this ad were treated as coordinated party expenditures and reported accordingly.<sup>36</sup>

Thus, in MURs 7173 and 7187, not even the question of attribution was present. At no point was there any basis for FACT to allege any violation of the limits as to the House campaigns.

#### The Portions of the Ads Attributable to Donald Trump Were Correctly II. Reported

Except in MUR 7177, the portions of the ads referenced by the Complaints and attributable to Donald Trump were paid for by the DCCC. In MUR 7177, the portion of the ad attributable to Trump was paid for by the Colorado Democratic Party. In each case, the party committee either filed the necessary independent expenditure report as to Trump or

-9-

<sup>&</sup>lt;sup>34</sup> See FEC Adv. Op. 2004-37 (Waters) at 2 (holing that payment for a "brochure would not constitute support of, or be an in-kind contribution to, the Federal candidates listed in the brochure, provided that the Federal candidates provide reimbursements in the appropriate amount in a timely manner"); FEC Adv. Op. 2004-01 (Bush/Kerr) at 6 (holding that "if the Bush-Cheney Committee reimburses the Kerr Committee for its attributable share of the expenses, there is no contribution"); FEC Adv. Op. 2004-29 (Akin).

35 See Exhibit B.
36 Id.

reported the attributable portion of the ad as operating expenditures, depending on whether the ad contained express advocacy.

To be an independent expenditure, a communication must include "express advocacy" for or against a "clearly identified" candidate.<sup>37</sup> However, although all of the relevant ads "clearly identified" Trump under 11 C.F.R. § 100.17, only the ads at issue in MURs 7169, 7170, 7171, 7174, 7176, and 7182 included "express advocacy" against him.<sup>38</sup> In these latter cases, the DCCC reported the portions of the ads attributable to Trump as independent expenditures opposing him.<sup>39</sup>

The ads in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not expressly advocate Trump's defeat. Accordingly, the portions of these ads' costs that were attributable to Trump were reported by the party as operating expenditures and not as independent expenditures. The definition of "express advocacy" is clearly set forth in the Commission's regulations, and when a communication does not meet this definition, the Commission has repeatedly held that the communication does not constitute an independent expenditure. 40

A communication expressly advocates if it: uses phrases such as "vote for the President," "Smith for Congress," or "Bill McKay in '94," or uses campaign slogans or individual words, which in context "can have no other reasonable meaning than to urge the election or defeat of one or more clearly identified candidates," such as a message saying "Nixon's the One," or "Carter '76," or when taken as a whole and with limited reference to external events, "could only be interpreted by a reasonable person as containing advocacy of the election or defeat" of a candidate because the "electoral portion of the communication is unmistakable, unambiguous, and suggestive of only one meaning" such that reasonable minds "could not differ as to whether it encourages actions to elect or defeat" the candidate. A message constitutes express advocacy "only if it contains a clear call to a specific electoral

<sup>&</sup>lt;sup>37</sup> 11 C.F.R. § 100.16.

<sup>&</sup>lt;sup>38</sup> Dangerous for PA Women, YouTube (Oct. 20, 2016) at :20 ("Say No To Donald Trump & Brian Fitzpatrick"), <a href="https://www.youtube.com/watch?v=7mb2DsowG00">https://www.youtube.com/watch?v=7mb2DsowG00</a>; Ruben Kihuen for Congress, Our Values, YouTube (Oct. 18, 2016) at :23 ("Vote NO on Cresent Hardy and Donald Trump"),

https://www.youtube.com/watch?v=ulkinwN7ivMU; Nelson for Wisconsin, No, YouTube (Oct. 10, 2016) at :25 ("Mike Gallagher says we still have to support Donald Trump. No, we don't; we don't have to support Mike Gallagher either"), https://www.youtube.com/watch?v=LS-gU95vm9U; Jim Mowrer, Now We Understand, YouTube (Oct. 19, 2016) at :28 ("Vote No on Donald Trump and David Young"),

https://www.youtube.com/watch?v=g\_4kBjw8r-U; Suzanna Shkreli for Congress, Brags, YouTube (Oct. 14, 2016) at :22 ("Vote No on Donald Trump and Mike Bishop"), https://www.youtube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.joutube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"), https://www.joutube.com/watch?v=WCx3ObETyrE; Bryan Caforio for Congress, Stand Up, YouTube (Oct. 12, 2016) at :27 ("Vote No on Trump"),

https://www.youtube.com/watch?v=i18196BhvWg&feature=youtu.be.

39 See Exhibit D (excerpts from relevant independent expenditure reports). There would have been no basis to consider the portions of the advertisements attributable to Trump as coordinated communications with the House campaigns. See Coordinated and Independent Expenditures, 68 Fed. Reg. 421, 431 (Jan. 3, 2003) (conduct standard cannot "be satisfied without some link between the request or suggestion and the candidate or political party who is, or that is, clearly identified in the communication").

<sup>40</sup> See, e.g., FEC Adv. Op. 1985-14 (DCCC).

<sup>41 11</sup> C.F.R. § 100.22.

action."<sup>42</sup> Even according to the Ninth Circuit, which has taken a very expansive approach to defining express advocacy:

Speech cannot be "express advocacy of the election or defeat of a clearly identified candidate" when reasonable minds could differ as to whether it encourages a vote for or against a candidate or encourages the reader to take some other kind of action. We emphasize that if any reasonable alternative reading of speech can be suggested, it cannot be express advocacy subject to the Act's disclosure requirements.<sup>43</sup>

Even by this broad standard, the advertisements at issue in MURs 7172, 7175, 7177, 7178, 7179, and 7188 did not include any words of express advocacy regarding Trump. In each case, a reasonable alternative reading exists for the communication as it pertains to Trump, insofar as they criticize his policy positions and their negative effects.

Several of the advertisements discuss Republican congressional candidates "support" for Donald Trump's positions. For example, in the advertisement at issue in MUR 7172 the script is as follows:

VOICE OVER: In an unsettled world, John Katko and Donald Trump's approach takes us down a dangerous path. [Showing footage of global unrest].

TRUMP: "I love war in a certain way."

VOICE OVER: But when asked about supporting Trump, Katko said ...

KATKO: "I absolutely will support."

TRUMP: "Tell them to go f--- themselves."

VOICE OVER: When national security leaders condemn Trump's reckless statements on foreign policy...

INTERVIEWER: "People are wondering how those things can happen and you not flat out denounce it?"

KATKO: "I'm more concerned about my race."

VOICE OVER: Not about the safety of our families. Trump and Katko put our national security at risk.

[DISCLAIMER].44

<sup>&</sup>lt;sup>42</sup> Statement of Reasons of Vice Chairman Petersen and Commissioners Hunter and McGahn at 4, Matter Under Review 6113 (Dec. 18, 2009).

43 FEC v. Furgatch, 807 F.2d 857, 864 (9th Cir. 1987).

<sup>44</sup> Colleen Deacon, Unsettled, YouTube (Oct. 8, 2016), https://www.youtube.com/watch?v=Ch4ToJp3Br0.

However, the word "support" in this context cannot only be interpreted as a call to vote against Donald Trump. Rather, it is intended to critique Donald Trump's desire for war, dangerous foreign policy "approach," and other previous actions and policy positions and Representative Katko's support of Trump despite these positions. This advertisement concludes with the statement that "Trump and Katko put our national security at risk." The advertisement does not say that viewers should vote against Donald Trump for President but refers to the contemporaneous actions of both Representative Katko and Donald Trump that are adverse to the United States' national security interests.

Similarly, consider the advertisement at issue in MUR 7175. The script of advertisement is as follows:

TRUMP: We're going to build a wall.

VOICE OVER: Donald Trump is tearing us apart. [SHOWING CURRENT NATIONAL UNREST]. Trump called a judge unqualified because of his Mexican heritage.

TRUMP: He's a Mexican. We're building a wall between here and Mexico.

VOICE OVER: And called Mexicans rapists and murderers. Donald Trump. Too dangerous for us. But Will Hurd says he could still support Donald Trump. And Will Hurd shares the same bad ideas.

WILL HURD: A wall absolutely makes sense.

VOICE OVER: Will Hurd. He's the wrong choice for Texas families.

[DISCLAIMER].45

This advertisement refers to several statements and policy positions of Donald Trump and observes the contemporaneous effects: his positions and actions are "tearing us apart" at this time. The advertisement does not include a call to defeat Donald Trump in the presidential election, but it does include a call to defeat Representative Hurd: it says that he is the "wrong choice for Texas families" because of his support of Donald Trump's positions. Citing Representative Hurd's support for Donald Trump as a reason to defeat Representative Hurd is not express advocacy with regard to Donald Trump. There is no portion of the advertisement that could only be interpreted as a call to vote against Donald Trump and thus the advertisement does not contain express advocacy against Donald Trump as defined at 11 C.F.R. § 100.22. As there is no "express advocacy" or "clear call to a specific electoral action" with regard to Donald Trump in any of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188, no portion of any of these advertisements should have been reported as independent expenditures opposing Donald Trump.

<sup>45</sup> Wrong Choice for TX Families, YouTube (Oct. 4, 2015), https://www.youtube.com/watch?v=GICZwJ3tYXw.

Because the portion of the advertisements discussed in MURs 7172, 7175, 7177, 7178, 7179, and 7188 attributable to Donald Trump did not contain express advocacy opposing Trump, they were properly reported by the DCCC and Colorado Democratic Party as operating expenditures. The Commission's regulations and previous decisions are clear: if a party committee airs a communication that does not constitute an independent expenditure or party coordinated communication, the expenses associated with the advertisements, or relevant portions thereof are operating expenditures.<sup>46</sup>

#### The Complaint Presents No Genuine Allegation of Coordination with HFA, and III. The Facts Demonstrate That None Occurred

None of the relevant advertisements was coordinated with HFA. There was no coordination between the Respondents on the one hand, and HFA on the other, regarding any of the advertisements cited by the Complaints. None of the Complaints alleges any specific facts that could even be taken to suggest coordination.<sup>47</sup>

Instead, the Complaints make the conclusory allegation that the advertisements were coordinated with HFA. However, such pure speculation cannot support a finding of a reason to believe. The Commission may find "reason to believe" only if a Complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the Act. 48 For claims of coordination, the Commission requires an even stronger showing: that Complainant provide "probative information of coordination." The Commission has also made clear that "unwarranted legal conclusions [drawn] from asserted facts" or "mere speculation" are not sufficient to find reason to believe that Respondents violated the Act through impermissible coordination.<sup>50</sup> Because the Complaints rely exclusively on pure speculation and unwarranted legal conclusions for their coordination claims, there is no reason to believe any coordination occurred.

The Commission also must consider whether Respondents have provided "sufficiently compelling evidence" to refute the Complaints' claims. In this case, the declarations accompanying this response provide strong, probative evidence of the absence of coordination between Respondents and HFA on these ads.<sup>51</sup> The declaration of Michael lan Russell, the DCCC's Deputy Executive Director and Political Director, is especially important. 52 Mr. Russell makes clear that he supervised the communications campaign at issue in these Complaints; that it did not involve any request, suggestion or assent from HFA; that he instructed those participating in the program to refrain from any

<sup>&</sup>lt;sup>46</sup> FEC Adv. Op. 1985-14 (DCCC) ("DCCC may report these expenditures as operating expenditures.").

<sup>&</sup>lt;sup>48</sup> Statement of Reasons, Commissioners Mason, Sandstrom, Smith, and Thomas, MUR 4960 (Dec. 21, 2001). <sup>49</sup> FEC Matter Under Review 5999, Factual and Legal Analysis (Dec. 15, 2008); see also FEC Matter Under Review 6059, Factual and Legal Analysis, at 6 (Feb. 3, 2009).

<sup>50</sup> FEC Matter Under Review 4960 (Clinton for U.S. Exploratory Committee), Statement of Reasons of Commissioners David M. Mason, Karl J. Sandstrom, Bradley A. Smith, and Scott E. Thomas at 1 (Dec. 21, 2000). 51 See Exhibits A and C.
52 See Exhibit A.

communications with HFA regarding the ads; and that he knows of no deviation from these instructions.<sup>53</sup>

Because the Complaints rely entirely on speculation to mount the claim of coordination, and because Respondents have provided compelling evidence to refute this speculation even when not required to do so, the Commission should dismiss these baseless claims.

## CONCLUSION

The FACT complaints are based completely on an incorrect factual assumption and a blatant misunderstanding of the law. FACT assumed that the Respondents were allocating the advertisements at issue according to the Commission's guidance on generic party hybrid advertising and apparently believe that such hybrid advertising is the only case in which a committee should allocate an advertisement between multiple federal candidates or purposes. In reality, the Commission's regulations provide for the attribution of any communication that concerns multiple Federal candidates. The Respondents followed the Commission's attribution regulations here, and paid for and reported each portion of the advertisements according to the requirements of the Act.

There is absolutely no merit to the allegations in any of the complaints in MURs 7169, 7170, 7171, 7172, 7173, 7174, 7175, 7176, 7177, 7178, 7179, 7182, 7187, and 7188 and the Commission should dismiss all of these complaints against all of the Respondents immediately.

Very truly yours,

Marc E. Elias

Brian G. Svoboda

Graham M. Wilson

Rachel L. Jacobs

Enclosure

Counsel to:

**DCCC** 

Santarsiero for Congress and Lora Haggard, in her official capacity as treasurer Ruben Kihuen for Congress and Jay Petterson, in his official capacity as treasurer Nelson for Wisconsin and Dr. Beth Gillis, in her official capacity, as treasurer Colleen Deacon for Congress and Jennifer May, in her official capacity as treasurer Applegate for Congress and Douglas Applegate, in his official capacity as treasurer

<sup>&</sup>lt;sup>53</sup> Id.

Mowrer for Iowa and Dennis Skinner, in his official capacity as treasurer Texans for Pete and Wayne Alexander, in his official capacity as treasurer Suzanna Shkreli for Congress and Jennifer May, in her official capacity as treasurer Carroll for Colorado and Mitchell S. Wright, in his official capacity as treasurer Eggman for Congress and Jay Petterson, in his official capacity as treasurer Stephanie Murphy for Congress and Jennifer May, in her official capacity as treasurer Bryan Caforio for Congress and Gonzalo Freixes, in his official capacity as treasurer Friends of Christina M. Hartman and Diane Toapkian, in her official capacity as treasurer

LuAnn Bennett for Congress and Jennifer May, in her official capacity as treasurer

## Exhibit A

### BEFORE THE

## FEDERAL ELECTION COMMISSION

## DECLARATION OF MICHAEL IAN RUSSELL

- I, Michael Ian Russell, do declare and state as follows:
  - 1. During the 2016 election, I worked for DCCC as Deputy Executive Director and Political Director. Through that position, I am familiar with the matters discussed herein. At no point during the 2016 election cycle did I serve as an employee, independent contractor, vendor, or agent of Hillary for America ("HFA").
  - 2. As the Deputy Executive Director and Political Director of DCCC, I worked with, and supervised other DCCC employees who worked with, numerous House campaigns on television advertisements that mentioned Donald Trump. Specifically, I worked with (a) Santarsiero for Congress on the advertisement discussed in the complaint in MUR 7169; (b) Ruben Kiluen for Congress on the advertisement discussed in the complaint in MUR 7170 (c) Nelson for Wisconsin on the advertisement discussed in the complaint in MUR 7171 (d) Colleen Deacon for Congress on the advertisement discussed in the complaint in MUR 7172 (e) Applegate for Congress on the advertisement discussed in the complaint in MUR 7173 (f) Mowrer for lows on the advertisement discussed in the complaint in MUR 7174 (g) Texans for Pete on the advertisement discussed in the complaint in MUR 7175 (i) Shkreli for Congress on the advertisement discussed in the complaint in MÜR 7176 (j) Carroll for Colorado on the advertisement discussed in the complaint in MUR 7177 (k) Eggman for Congress on the advertisement discussed in the complaint in MUR 7178 (I) Murphy for Congress on the advertisement discussed in the complaint in MUR 7179 (m) Bryan Caforio for Congress on the advertisement discussed in the complaint in MUR 7182 (n) Friends of Christina M. Hartman on the advertisement discussed in the complaint in MUR 7187 and (o) LuAnn Bennett for Congress on the advertisement discussed in the complaint in MUR 7188 (each a "Campaign" or "Advertisement" or collectively the "Campaigns" and "Advertisements," respectively). I took the lead at DCCC for managing this advertising program. I supervised this program and all DCCC staff working on these Advertisements. I was also in contact, directly or indirectly through my staff, with each of the Campaigns involved in these Advertisements.
  - 3. This program was conceived by DCCC without any request, suggestion, or assent by HFA or its agents. DCCC believed that the advertising program would be an effective way to promote our Democratic House candidates and the Democratic Party, given the intense opposition among Democratic voters to Donald Trump and the policies and positions he espoused.
  - 4. I managed every aspect of the creation, production, and dissemination process for each of these Advertisements, starting with script development through the advertising buying phase of each Advertisement. To that end, with a core group of DCCC staff, I worked directly with each Campaign and advertising vendor to draft each script and produce and edit each Advertisement.

PAGE 02/03

١

- 5. I instructed my staff working on the Advertisements and the staff of Campaigns involved with the Advertisements not to discuss any aspect of these Advertisements with HFA or its agents. Likewise, my staff and the Campaigns were instructed not to have any involvement with HFA or its agents with regard to these Advertisements. I am not aware of any breach of or deviation from this protocol.
- 6. To the best of my knowledge, and consistent with the instructions I gave, these Advertisements were developed internally at DCCC in coordination with each Campaign without any communication with or from Hillary for America or its agents. Likewise, to the best of my knowledge, none of the Advertisements were created, produced, or distributed at the suggestion or request of HFA or its agents nor did they assent to the creation, production, or distribution of any of the Advertisements.
- 7. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had any involvement with HFA or its agents regarding any Advertisement in any way, including, but not limited to:
  - i. the content of any Advertisement;
  - ii. the intended audience for any Advertisement;
  - iii. the means or mode of any Advertisement;
  - iv. the specific media outlet used for any Advertisement;
  - v. the timing or frequency of any Advertisement; or
  - vi. the duration of any Advertisements.
  - 8. In my work for DCCC on the Advertisements, to the best of my knowledge, neither I nor any DCCC employee or Campaign staff working on these Advertisements had discussions about with HFA or its agents about any Advertisement or HFA's plans, projects, activities, or needs with regard to any Advertisement. Neither HFA nor its agents conveyed to me, and to the best of my knowledge to any DCCC employee or Campaign staff working on these Advertisements, any relevant information about HFA's plans, projects, activities, or needs concerning any Advertisement.
  - 9. To the best of my knowledge, no DCCC employee or Campaign staff working on these Advertisements was employed by HFA at any time during the 120 days prior to the date that each Advertisement was aired.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this Z/w+ day of December, 2016.

Michael Ian Russell

## Exhibit B

Image# 201612089039916605

# SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

OR FEDERAL OFFICE PAGE 109105 OF 109107

(To bo	used only	by Po	iltical Com	nittees in the Gene	ral Election	FOR L	NE 25	OF FORM 3X
NAME OF COMMITTEE (In Full)								
DCCC								
Has your committee been designated to make				ordinate Committee				
coordinated expenditures by a political party or ix YES ! NO	ommiltee?	נ	occc					
! X YES   NO If YES, name the designating committee:		Malling	Addross	430 South Capitol S	ireel SF			
Democratic National Committee	e &		-	2nd Floor .	.,,			
Pennsylvania Democratic Party		City				State	ZIP C	• •
Tens a constant to		vvasn	inglon	2 Maria Bara		DC	2000	3-4024
Full Name (Last, First, Middle Initial) of Ea	cn Payee			: Memo Ilem	Purpose of Media Se			
Mundy Katowitz Media, Inc.				<b>,</b> .				Category/
Mailing Address 1322 G Stroot, SE								Туре
Size	State		77.0.4	<del></del>	Date			
City · · · · · · · · · · · · · · · · · · ·	State		Zip Codo 20003		10	ຶ21ັ	•	2016
	lilice Sough		House	State: PA	Amount			·
Hartman, Christina. , ,		1.	Sonate	District: 16	71			ı
			Presidential	<u> </u>		.i	. 9	6070,00
Aggregate General Election			96070	.00	٠.			
Exponditure for this Candidate >	Transac	tlon ID	, : SF-953178	;				ľ
Full Name (Last, First, Middle Initial) of Ea			····		Purpose of	Expenditure		
								'
Mailing Address								Category/ Type
Maning Address					Date	<del></del>		1700
City	State		Zip Code		r ų	ie e e		
Name of Carles Conditions Supercular			<u> </u>					
Name of Federal Candidate Supported O	Itice Sough		House Sanate	State:	Amount	•		
			Presidential	District.				
Aggregate General Election						•	•	•
Expenditure for this Candidate				J				•
Full Name (Last, First, Middle Initial) of Eur	sh Devos			: ! Memo Item	Purpose of I	Expanditure	—	<del></del>
Poi regine (casi, riisi, middle illieal) of car	Cit rayee			; · Memo Kem	· u.poot or ·	- Politica C		
								Category/
Mailing Address				)				Туре
City -	State	—— 1	Zip Code		Date			, , ,
City .	- Ciaco		L.p 0000		·	•		1
Name of Fuderal Condidate Supported O	ffice Sough	i;	House	State:	Amount	<del>,</del>		
1			Sonale	District:				
		<u> </u>	Presidential	<u> </u>	•	•	,	
Aggregate General Election Expenditure for this Candidate ▶								
Experience for this Candidate	,		·					
								070.00
SUBTOTAL of Expenditures This Page (option	ial)						, 9	5070.00
TOTAL This Period (last page this line number	only)		,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,					

Image# 201610279034718056

## SCHEDULE F (FEC Form 3X)

ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE								47529	OF 47535
									OF FORM 3X
NA	ME OF COMMITTEE (In Full)								
[	DCCC			•					
Ha	s your committee been dusignated to ma	ke .	Full N	one of Subc	ordinale Committee	<del></del>			<del></del>
CO	ordinated expenditures by a political party	committee?	ם ו	CCC					
	Y YES NO		l				<del> </del>		
	ES, name the designating committee:	0	] Mailint	Address	430 South Capitol S 2nd Floor	Street, SE			
	Democratic National Committ Michigan Democratic Party	ee a	Cliv		210 11001	——————————————————————————————————————	State	T ZIP C	odo
	michigan Democratic Party		Wash	ington			DC	2000	3-4024
	Full Name (Last, First, Middle Initial) of	Each Payee			: i Memo Item	Purpose of 6			
	Three Point Media, LLC					Media Se	rvices		
į	Mailing Address 1000 Potoniac Street, I								Catogory/ Type
	Sulte 500	MAA				Dale			.,,,,,
	City	Stato		Zip Code		10	13	•	2016
	Washington	00		20007					
İ	Name of Foderal Candidate Supported	Office Sough	, ·		State: MI District: 07	Amount		•	
	Driskell, Gretchen, , ,		1 4	Sonale Presidential	District: 07				1000.00
	Aggregate General Election	<del></del>		<del></del>	·		•	•	•
	Expenditure for this Candidate	:		96200	•	,			
Transaction ID : SF-951470									<del>,</del>
Full Name (Last, First, Middle Initial) of Each Payee : i Morno Item						Purpose of 6 Media Se			İ
Mundy Katowitz Media, Inc						) 			Category/
	Mailing Address 1322 G Street, S	SE.							Тура
	Ch.	State		Zip Code	<del></del>	Date		.,	
į	City Washington	DC		20003		10	13	•	2016
	Name of Federal Candidate Supported	Office Sough	nt: ]×!	House	Slate: MI	Amount	<u> </u>		
	Driskell, Gratchen		i .	Senate	Olstrict: 07	1			_
			<u></u> '	Presidential	1		1	;	95200.00
	Aggregate General Election  Expenditure for this Candidate ▶			96200	.00				
		n ID : SF•951		,	·				
	Full Name (Last, First, Middle Initial) of	Each Payes	•		) i Memo Item	Purpose of E	•		
	Buying Time, LLC					Media Se	rvices		
	Mailing Address 650 Massachusetts Ave	www.MW			<del></del>				Category/ Type
	Suite 210	# TUE, 1999				Dato			· · · · · · · · · · · · · · · · · · ·
	City	State		Zip Code		10	6 H '		4.0
	Washington Namu of Federal Candidate Supported	DC		20001		10	17		116
	Shkreli, Suzanna	Office Sougi		House Senate	State: MI District: 08	Amount			
	Common, Concernation, 1, 1		1 1	Presidential		l			52960.00
	Aggregate General Election					1	•	•	•
	Expenditure for this Candidate	_ !		52960	,00				
_		Transaction	in : 21-	·934U04	<del></del>	L			
S	UBTOTAL of Expenditures This Page (op	tional)		q-1 =0 = 110 to = 1-0-** = 1.			•	. 14	19160,00
		·	<del></del>		<del></del>		•		
T	OTAL This Period (last page this line num	nber only)			······				•

## lmago# 201612209040802696

# SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

ON BEHALL OF CAMBIDATES FOR FEBERAL OFFICE							PAGE 109107 OF 109107		
(To be used only by Political Committees in the Goneral Election)								INE 25 OF FORM 3X	
	ME OF COMMITTEE (In Full)								
	DCCC								
	s your committee been designated to make		Full		ordinate Committee				
COC	ordinated expenditures by a political party con	nmittee?		DCCC					
	YES, name the designating committee:	ļ	Mail	ling Address	430 South Capitol	Street, SE			
	Democratic National Committee				2nd Floor				
			City Wa	shington		Sta DC		ZIP Code 20003-4024	
	Full Name (Last, First, Middle Initial) of Each	h Payee			☐ Memo Ilem	Purpose of Expe		المشمشما	
	Murphy Vogel Askew Reilly, L	.LC				Media Service	98	Category/	
	Mailing Address 1199 N. Fairfax St . Suite 220					Date		Туре	
	City	State		Zip Code		10	24	2016	
	Alexandria Name of Federal Candidate Supported   Officering Candidate		22314		harad h		أستستست		
	•	fice Sough	ht:  #	House Senate	State: WI District: 08	Amount			
	Nelson, Tom, , ,		┢	Prosidentia		1	-yy	1000.00	
	Aggregate General Election			7 1 10000000000	-	ة السائسا عبط	-	المساسية المساهدة الد	
	Expenditure for this Candidate	Transac	tion	3370 ID : SF-95328					
	Full Name (Last, First, Middle Initial) of Eacl				☐ Memo Item	Purpose of Expe	enditure	[	
								Category/ Type	
	Mailing Address						<del>-</del>	Туре	
	City	State		Zip Code		[uta]	6767	44.44.444	
	Name of Federal Candidate Supported Officers	lice Soug	ht:	House	State:	Amount			
			Ļ	Senate	District:	-		1 - 2 - 2 - 2 - 1 - 1 - 1 - 1 - 1 - 1 -	
				Presidentia	11	دانیمیسا ا			
	Aggregate General Election Expenditure for this Candidate ▶			ماسياس است		}			
	Full Name (Last, First, Middle Initial) of Eacl	h Pavee			Memo Item	Purpose of Expe	anditure	Company	
į	, , , , , , , , , , , , , , , , , , , ,							Category/	
	Mailing Address					Date		Туре	
	City	State	_	Zip Code		[10.4.10]	ا لعده	*******	
	Name of Federal Candidate Supported Off	fice Sougi	ht:	House	State:	Amount			
	1			Senate	District:			استاستان المستاسات	
i	<u> </u>			Presidentia	1 .	<b>│                                    </b>		المستعمدين المستعمدين	
	Aggregate General Election Expenditure for this Candidate ▶	نيبة السيالي		سائس السائد		]			
Γ				<del></del>		-	7	7-7-7-7	
s	UBTOTAL of Exponditures This Page (options	al)	******		······	<u></u>		1000.00	
T	OTAL This Period (last page this line number	only)				13	<del></del>	1543282.59	

## SCHEDULE F (FEC Form 3X)

## ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S) ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE

	(To	be used or	nly by P	olitical Comm	nittees in the Ge	neral Election	) FOR L	INE 25 OF FORM 3X
NA	ME OF COMMITTEE (In Full)						<u>1</u>	
	occc							
Has	your committee been designated to me	ike ·	Full	Name of Subo	ordinate Committe	Э	<del></del> -	
COO	rdinated expenditures by a political part	y committee	?	DCCC				
ll Y	X YES NO ES, name the designating committee:		Maiti	ng Address	430 South Capito	Street SF		
	emocratic National Commit	tee	L		2nd Floor	. 0100, 02		
			City Was	shington			State DC	ZIP Code 20003-4024
Full Name (Last, First, Middle Initial) of Each Payee						Purpose of Media S	Expenditure ervices	
Ì	Mailing Address 650 Massachusetts Av Suite 210	enue, NW		-		Date		Category/ Type
Ì	City	Sta	le	Zip Code	*	1076	1 5000	¥47.457
١	Washington		DC	20001			المساسيا	2016
Ì	Name of Federal Candidate Supported Nelson, Tom, , ,	Office Sor	ught: 🔀	House Senate	State: WI District: 08	Amount		
	Neison, rom, , ,	ļ		Presidential				32700.00
	Aggregate General Election		- <u>,                                   </u>		-		mi i Tudomina	ri Jaminan Catalian da Anglang
	Expenditure for this Candidate >	المراسين المساس		32700 D : SF-951664				
	Full Name (Last, First, Middle Initial) of			D: 57-931004	Memo Iten	Purpose of	Expenditure	Barrathan Barrat
	Adelstein & Associate		-		<u>_</u> ,	Media S		Category/
	Mailing Address 222 West Onta	rio Street, St	uite 600			Date		Туре
	City Chicago	Sta		Zip Code 60654		10	13	2016
	Name of Federal Candidate Supported	Office So	ught: 🗴	House	State: IL	Amount		
	Schneider, Bradley, Scott, ,	•		Senate Presidential	District: 10			48100.00
	Aggregate General Election Expenditure for this Candidate	- Arrigan Ar		48100	.00			
	· -	on ID : SF-9	51461	na i i mallana i i i i i i i i i i i i i i i i i i				
	Full Name (Last, First, Middle Initial) of	Each Paye	e		Memo Iten	Purpose of	Expenditure	Category/
	Mailing Address					Date		Туре
	City	. Ste	ite	Zip Code	· · · · · · · · · · · · · · · · · · ·	ן היינון <u>היינון</u>	10.00	7*777*
	Name of Federal Candidate Supported	Office So	ught:	House	State:	Amount	W. Hall Company	Versial designation of the second
			-	Senate Presidential	District:	.		*******
	Aggregate General Election Expenditure for this Candidate ▶					<b>I</b>		<u> </u>
SI	JBTOTAL of Expenditures This Page (o	ptional)					و سال در است	80800.00
TO	OTAL This Period (last page this line nu	mber only)				-	error Same Same Same	1516806.99

PAGE 47535 OF 47535

Image# 201610209034264673

## SCHEDULE F (FEC Form 3X) ITEMIZED COORDINATED PARTY EXPENDITURES MADE BY POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)

ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE							PAGE	PAGE 83515 OF 63518			
	(To be us	ed only	by Pa	litical Comm	nittees in the Gene	ral Election	FOR L	INE 25	OF FORM 3X		
NAME OF COMMITTEE (In Full)								• •			
DCCC	, ,										
las your committee bean designa	led to inake		Full N	ame of Subo	ordinate Committee						
coordinated expenditures by a poli	tical party com	nittee?	(	OCCC				•			
Y YES NO	ibaa.		Maille	Address							
f YES, name the designating com Democratic National Ci		2	IAICETTH I	4 voness	430 South Capitol S 2nd Floor	Street, Sc					
California Democratic F		•	City				State	SIP C	ade		
			Wash	ington			DC .	2000	3-4024		
Full Name (Last, First, Middle	•	Payee			· Memo Item	Purpose of Media S	Expenditure				
The New Media Firm	n, Inc.					111000	01 11003		Category/		
Mailing Address 1730 Rhode	Island Ave., NW								Type		
Suite 213			·	T		Date	_				
Glty Washington		State	,	Zip Code 20036	·	"09 <b>"</b>	20	•	2016		
Name of Federal Candidate Se	pported Offic	e Sough			State: CA	Amount			<del></del>		
Applegate, Doug, Loren,				Senate	District: 49						
			<u> </u>	Presidential			•	, 9	1200.00		
Aggregate General Election				91200	.00						
Expenditure for this Candidate	•	, Transac	tion ID	: SF-949904							
Full Name (Last, First, Middle					· Memo Item		Expenditure				
Screen Strategie	es Media, l	LC				Media S	ervices				
Mailing Address 11150	Fairfax Blvd							!	Category/ Type		
Suite						Date			· · · · · · · · · · · · · · · · · · ·		
City		State		Zip Code			23		2016		
Fairfax Namo of Federal Candidato, Si	ipported   OHio	e Sough		22030	State: CA						
Caforio, Bryon, , ,	Citie	e Sougi	ii. 🗭	Senate	State: <u>CA</u> District: 25	Amount					
	<u> </u>			Presidential				, '	6490.00		
Aggregate General Election				96200	.00		•	•			
Expenditure for this Candidate	ransaction ID	, SE_050	กรัส	4							
Full Name (Last, First, Middle			<u> </u>	<del></del>	- Meino Item	Purpose of	Expenditure				
Screen Strategies M	edia, LLC	•				Media S	ervices				
									Category/ Type		
Mailing Address 11150 Fairlax Suite 505	Blvd					Date		لــــــــــــــــــــــــــــــــــــــ	,Alim.		
City		State		Zip Code		ı. (ı		1 _	/		
Fairfax		VA		22030		09	<b>28</b> .	20	16		
Name of Federal Candidate Se	opported Office	e Sough	it: 🗶	House	State: CA District: 25	Amount					
Calorio, Bryani	l		";	Senate Presidential				٠ 1	3431.04		
Aggregate General Election			<del>-</del> -				•	•			
Expenditure for this Candidate				96200	.00						
<u> </u>	Tran	saction	ID : SF	-950737		<u></u>		<del></del>	<del></del>		
SUBTOTAL of Expenditures This	Page (optional)	)aa						, 15	1121,04		
								•	=		
TOTAL This David Hand word the	- 11-0										

## Exhibit C

## **BEFORE THE**

## FEDERAL ELECTION COMMISSION

## **DECLARATION OF MAURA JOHNSON - MUR 7179**

- 1, Maura Johnson, do declare and state as follows:
  - During the 2016 election, as a Media Supervisor at GMMB, Inc. ("GMMB"), I provided
    media buying services for Ralston Lapp Media, the consultant working with Stephanie
    Murphy for Congress. Through that position, I am familiar with the matters discussed
    herein.
  - 2. During that time, I worked with DCCC and Stephanie Murphy for Congress to distribute an advertisement discussed in the complaint in FEC Matter Under Review 7179 (the "Advertisement"). To the best of my knowledge and belief, I was the only employee of GMMB that worked on the Advertisement.
  - 3. GMMB worked for Hillary for America ("HFA") during the 2016 election cycle.
  - 4. To the best of my knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
  - 5. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had any involvement with HFA or its agents regarding the Advertisement in any way, including, but not limited to:

MJ 12/21/16

- i. the content of the Advertisement;
- ii. the intended audience for the Advertisement:
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of my knowledge, neither I, nor any employee or agent of GMMB working on the Advertisement, had discussions with HFA or its agents about the Advertisement.
- 7. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of my knowledge, neither I, nor any employee or agent of GMMB in working on the Advertisement, used information previously used by GMMB in providing services to HFA in relation to the distribution of the Advertisement.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this <u>31</u> day of December, 2016.

Maura Johnson

## **BEFORE THE**

## FEDERAL ELECTION COMMISSION

## DECLARATION OF DAVID DIXON AND RICHARD DAVIS, DIXON/DAVIS MEDIA GROUP LLC - MUR 7188

David Dixon and Richard Davis do declare and state as follows:

- During the 2016 election, we were partners at the Dixon/Davis Media Group LLC
   ("Dixon/Davis"). Through that position, we are familiar with the matters discussed
   herein.
- At the request of DCCC, and with the guidance of DCCC and their legal counsel,
   Dixon/Davis worked with DCCC and LuAnn Bennett for Congress to create, produce,
   and distribute an advertisement discussed in the complaint in FEC Matter Under Review
   7188 (the "Advertisement").
- 3. Dixon/Davis worked for Hillary for America ("HFA") during the 2016 election cycle.
  - 4. To the best of our knowledge, the Advertisement was not created, produced, or distributed at the suggestion or request of HFA or its agents and HFA or its agents did not assent to the creation, production, or distribution of the Advertisement.
  - 5. To the best of our knowledge, no employee or agent of Dixon/Davis working on the

    Advertisement had any involvement with HFA or its agents regarding the Advertisement
    in any way, including, but not limited to:
    - i. the content of the Advertisement;

- ii. the intended audience for the Advertisement;
- iii. the means or mode of the Advertisement;
- iv. the specific media outlet used for the Advertisement;
- v. the timing or frequency of the Advertisement; or
- vi. the duration of the Advertisement.
- 6. To the best of our knowledge, no employee or agent of Dixon/Davis working on the Advertisement had discussions with HFA or its agents about the Advertisement.
- 7. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used or conveyed information about HFA's campaign plans, projects, activities, or needs to create, produce, or distribute the Advertisement.
- 8. To the best of our knowledge, no employee or agent of Dixon/Davis in working on the Advertisement used information previously used by Dixon/Davis in providing services to HFA in relation to the creation, production, or distribution of the Advertisement.

We declare under penalty of perjury that the foregoing is true and correct. Executed on this Zavaday of December, 2016.

David Dixor

Richard Day

## Exhibit D

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 9 OF 9
(Schedule E)	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER ▼
	C C00000935
Check if 24-hour report 48-hour report New report Amends report filed	on Turky The of Tricky The of
Full Name of Payee	Date of Public Distribution/Dissemination
Old Towne Media Date of Dissemination: 10/19/16	10 19 2016
Mailing Address 4507 Penwood Or	Amount
City State Zip Code	48000.00
Alexandria VA 22310	Transaction ID : SE-952383  Date of Dispursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Out  Type	10 1 18 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Dato Disbu	ursement For: Primary General
Per Election for Office Sought 1 2742321.20 2016	Other (specify) >
Full Name of Payee	Date of Public Distribution/Dissemination
AL Media, LLC Date of Dissemination: 10/19/16	[ 10 ] 10 10 1 2010 July 2010
Mailing Address 222 West Ontario Wost	1011200
Sulle 600	Amount
City State Zip Code	81321.00
Chicago IL 60854	Transaction ID : SE-952867  Date of Disbursement or Obligation
Purpose of Expenditure Category/ Control	4.0.20 7.3.1 L.Q.2.3.9.4 L. L.A.2.40.0.40.4.4.4.4.4.4.4.4.4.4.4.4.4.4.4
Modia Buy 1998 1004	10 14 2016
Name of Federal Candidate Support Office	e Sought: House District: 00
Donald J. Trump Signature (Compose Signature)	President Schale State:
	ursoment For: Primary X General
Per Election for Office Sought 2742321.20 2016	Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures	129321.00
	a of the second
(b) SUBTOTAL of Unitemized Independent Expenditures	المناه والمساه والمناه والمناه
	ويعطره والمهدار المركمي والمرواء الروايي
(c) TOTAL Independent Expenditures	273146.39
Under ponalty of perjury I cortify that the independent expenditures reported herein were not may with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (If the reporting entity is not a political
Kally C. Wood	"H' M. "na . 3 w 5 w c w""" o l
Kelly C. Ward	0 21 2016
Signature	

24/48 HOUR REPORT OF INDEPENDEN	T EXPEND	TURES	<u> </u>
(Schedule E)			PAGE 48 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	<del></del>	<u></u>	FEC IDENTIFICATION NUMBER
DCCC			C c00000935
		<del></del>	سام شیماسیه برخت فیت کی ا
Check if 24-hour report 1 48-hour report	New rapo	ort [ Amends repo	ort filed on
Full Name of Payee			Date of Public Distribution/Dissemination
Screen Strategies Media, LLC  Date of Dissemination: 1	0/24/16	·	10   24   2016
Mailing Address 11150 Fairfax Bivd			Amount
Suite 505			Sundruction and the second desirable and
City	Stato	Zip Code	45000.00
Fairfax	VA	22030	Transaction ID : SE-952072  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	,	Category/ Type 004	10 17 2016
Name of Federal Candidato	<del></del>	Support	Office Sought: House District: 00
Donald J. Trump		Oppose	President Senato State:
Calendar Year-To-Date			Disbursement For: Primary Gener
Per Election for Office Sought	)	53174.61	2016 ☐ Other (spacify) ▶
Full Name of Payee			Date of Public Distribution/Dissemination
AL Media LLC  Date of Dissemination: 1	0124/18		10 24 2016
Mailing Address 222 W Ontario St	0/24/10		2016
Suite 600		•	Amount
City	State	Zip Code	131250.00
Chicago	IL	60654	Transaction ID : SE-953187  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ 004	10 21 2 2016
		Type	- ! Later Important
Name of Federal Candidate		Support	Office Sought: House District: 00
Donald J. Trump		Oppose	President   Senate State:
Calendar Year-To-Date		,	Disbursement For: Primary X Gener
Per Election for Office Sought	المالية المستوالة	3653174.61	2016 Other (specify)
(a) SUBTOTAL of Itamized Independent Expenditure	16	***************************************	176250.00
1			مان مان مان المان ال المان المان ال
(b) SUBTOTAL of Unitemized Independent Expendit	Ures		· ·
(a) YOYAL Independent Europedibuses			and the second s
(c) TOTAL Independent Expenditures		,c,t0,000(3810) is 4101 Ma + 72+12 73+12 40	بطائد كالمصابحينيين الصحابين بالداعي بالأداع
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee any political party committee or its	le or authorized	reported herein were committee or agent o	not made in cooperation, consultation, or concer of either, or (if the reporting entity is not a political
Koliy C. Ward		_	A ( A ) A ( A ) A ( A ) A ( A ) A ( A )
Signature		. Date	10 1 25 7 2015

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 51 OF 60
(Schedule E)	PAGE 51 OF 60 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ♥
DCCC	C c00000935
Check If 24-hour report 48-hour report New report Amend	ds report filed on
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16 Mailing Address 222 W Ontario St	10 25 2016
Suite 600	Amount
City State Zip Code	9000.00
Chicago IL 60654	Transaction ID : SE-953228  Date of Disbursement or Obligation
Purpose of Expenditure Category/ Type	004 10 24 2016
Name of Federal Candidate Supp	port Office Sought:   House District: 00
Donald J. Trump Oppor	pose President Senate State:
Calendar Year-To-Date Per Election for Office Sought 4369947.93	Diabursement For: Primary General 2016 Other (specify)
Full Name of Payee Canal Partners Media, LLC	Date of Public Distribution/Dissemination
Date of Dissemination: 10/25/16	10 1 25 2016
Mailing Address 25 Whitlock Place	Amount
Suite 200	
City State Zip Code Marietta GA 30064	Transaction ID : SE-952497 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Category/ Type	004 10" 19 2016
Name of Federal Candidate Supp	port Office Sought: House District: 00
Donald J. Trump Oppo	pose President Senate State:
Calendar Year-To-Date Por Election for Office Sought 4369947.93	Disbursement For: Primary General 2016 Other (specify)
p R C to and	.   I   Other (specify)
(a) SUBTOTAL of Itemized Independent Expenditures	193082.00
(b) SUBTOTAL of Uniternized Independent Expenditures	Minimum b
(c) TOTAL Independent Expenditures	
Under penalty of perfury I certify that the independent expenditures reported trerein with, or at the request or suggestion of, any candidate or authorized committee or ac party committee) any political party committee or its agent.	were not made in cooperation, consultation, or concert gent of either, or (if the reporting entity is not a pullifical
Kelly C. Word	Onto 10 25 2016
Signaturo	· · · · · ·

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 23 OF 23
	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)  DCCC	FEC IDENTIFICATION NUMBER Y
0000	C C00000935
	Andreas accina
Check if 24-hour report 48-hour report Now report Amends report	I filed on the state of the sta
Full Name of Payer	Date of Public Distribution/Dissemination
Moore Campaigns, LLC	10 28 2016
Mailing Address 447 Irving St, NW	
	Amount
City State Zip Code	4472.36
Washington DC 20010	Transaction ID: SE-954234
	Date of Disbursement or Obligation
Purpose of Expenditure Mail Services  Category/ Type: 006	10 27 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	·
Per Flection for Office Sought 4593586.81	2016
All and All an	. Other (specify) ▶
Full Name of Payee AL Media LLC	Date of Public Distribution/Dissemination
AC MODIA CCO	10 28 2016
Malling Address 222 W Ontario St	·
Suite 600	Amount
Cliy State Zip Code	30525,00
Chicago IL 60654	Transaction ID : SE-953928 Date of Disbursament or Obligation
Purpose of Expenditure Media Buy  Category/ O04	10 26 2016
Type	10 26 2016
Name of Federal Candidate . Support	Office Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
	Disbursement For: Primary General
Celendar Year-To-Date Per Election for Office Sought 4593586.81	2016 1
h. C. A. Al a. S. a. all animalands	Other (specify) >
	المستحامة فالمعتبي المحاربة والمارات المارات ا
(a) SUBTOTAL of itemized independent Expendituros	34997.36
	inger the familiarity of authorities from Facility
(b) SUBTOTAL of Unitemized Independent Expenditures	• 1
•	a series and a series of a series
(c) TOTAL Independent Expenditures	1588663.18
Under penalty of perjury I cortily that the independent expenditures reported herein were no	of made in cooperation, consultation, or concert
with, or at the request or suggestion of, any candidate or authorized committee or agent of	either, or (if the roporting anilty is not a political
perly committee) any political parly committee or its agent.	
Kalla A. Illand	
Kelly C. Ward	10 29 2016
Signature	i en al meta i

Image# 201610319037014651 24/4 (Scl NAM D(

24/48 HOUR REPORT OF INDEF (Schedule E)	'ENDENT EXPEND	DITURES		PAGE 7	OF 8
·				FOR SE OF	
NAME OF COMMITTEE (In Full) DCCC			FEC	IDENTIFICATIO	N NUMBER T
			C	C00000935	
Check if 🗶 24-hour report 🗀 48-hour	report New re	port Amends repo	ort filed on	( COTO ) (	, A & A & A & A
Full Name of Payee Adelstein & Associates LLC	; emination: 10/31/16		Date of Pub	lic Distribution/D	V-10-10-10-1
Mailing Address 222 West Ontario Stree			Amount	31	2016
City	State	Zip Code		فسين مساوسة	90000 00
Chicago	IL	60654		ID: SE-954371 oursement or Ob	
Purpose of Expenditure Media Buy	•	Category/ Type 004	10	28	2016
Name of Federal Candidate		Support	Office Sought:	House D	listrict: 00
Trump, Donald, J., ,	•	Oppose	✗ President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		4979620.65	Disbursement For: 2016 Othor (s	Primary specify) ▶	✗ General
Full Name of Payee Adelstein & Associates LLC Date of Disso Mailing Address 222 West Ontario Str	emination: 10/31/16		Date of Pub	olic Distribution/D	Dissemination 2016
			Amount		
City	State	Zip Code			67387.50
Chicago	IL	60654		ID : SE-954372 bursement or Ot	bligation
Purpose of Expenditure Media Buy		Category/ Typo 004	10	28 '	2016
Name of Federal Candidate		Support	Office Sought:	House D	District: 00
Trump, Donald, J., ,		X Oppose	X President	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		4979620.65	Disbursement For: 2016 Other (	Primary	✗ General
(a) SUBTOTAL of Itemized Independent	Expenditures		·· >		147387.50
(b) SUBTOTAL of Unitemized Independe	nt Expenditures		·· >		
(c) TOTAL Independent Expenditures	•			ومسلاة المساسسة المساد	
Under penalty of perjury I certify that the with, or at the request or suggestion of, a party committee) any political party comm	any candidate or authorize	es reported herein were ed committee or agent o	not made in cooper of either, or (if the re	ation, consultation porting entity is	on, or concert not a political
Ward, Kelly, C., ,	[F.lectro	onically Filed] Date	10 31	2016	-
Signature			hadaad kaala	and frankrike	أسيباب

24/48 HOUR REPORT OF INDEPENDE (Schedule E)	NT EXPEN	DITURES		PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			FEC	IDENTIFICATION NUMBER ▼ C00000935
Check if 24-hour report 24-hour report	New n	eport Amends repo	ort filed on	* h * *
Full Name of Payer Screen Strategies Media, LLC Date of Dissemination:	10/18/16		Date of Pu	blic Olstribution/Dissemination
Mailing Address 11150 Fairfax Blvd				.5 50.5
Suite 505			· Arnount	
City	State	Zip Code	<del></del> (	134898.50
Fairfax	VA	22030	Transactio Date of Dis	n ID : SE-952377 bursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	້ 10	11 2016
Name of Federal Candidate	<del></del>	Support	Office Sought;	House District: 00
Donald J. Trump		🔀 Oppose	X President	Senate State:
Calendar Year-To-Date Fer Election for Office Sought	, ,	2613000.20	Disbursement For: 2016 - Other (	Primary X General
Full Name of Payee Kully Hall, LLC  Date of Dissemination:  Mailing Address 1932 1st Ave. Suite 203	10/18/16			blic Distribution/Dissemination
City Scattle	State WA	Zip Code 98101		6225.00 ID : SE-952379
Purpose of Expenditure Media Buy Media Production		Category/ Type	<del></del>	sbursement or Obligation
Name of Federal Candidate		Support	Office Sought:	: House District: 00
Donald J. Trump		X. Oppose	X President	
Calendar Year-To-Date Por Election for Office Sought	, .,	2613000.20	Disbursement For:	
(a) SUBTOTAL of Hemized Independent Expenditu				, 141123.50 ,
(c) TOTAL Independent Expenditures			•	
Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or it	late or authoriz	es reported herein were ed committee or agent o	not made in cooper f either, or (if the re	ration, consultation, or concert conciling entity is not a political
Kelly C Ward	ag þag "Þagstanska	Date	, 10° 19	2016

24/48 HOÙR REPORT OF INDEPEND Schedule E)	ENT EXPE	NDITURES		PAGE 48 OF 60
NAME OF COMMITTEE (In Full)	<del></del>	<del></del>		FOR SE OF FORM 24/48
DCCC	••			FEC IDENTIFICATION NUMBER V
		٠.		C C00000935
Check if 24-hour report 48-hour report	X. New	report . + Amends rep	ort filed	u a a p. · · · · · · · · · · · · · · · · · ·
Full Name of Payer Screen Strategies Media, LLC		•		Date of Public Distribution/Dissemination
Date of Disseminari Mailing Address 11150 Fairtax Blvd	on: 10/24/16			10 24 2016
Suite 505				Amount
City	State	Zip Code		45000.00
Fairfax	VA	22030		Transaction ID : SE-952072 Date of Disbursement or Obligation
Furpose of Expanditure Media Buy		Calegory/ Type 004		10 17 2016
Name of Federal Candidate		Support	Office	e Sought: House District: 00
Donald J. Trump		X Oppose	×	President Senate State:
Catendar Year-To-Date Per Election for Office Sought	,	3653174,61	Disbi 2016	ursement For: , ? Primary X General
5 11 12 12 12 12 12 12 12 12 12 12 12 12	······	· · · · · · · · · · · · · · · · · · ·	<u> </u>	
Full Name of Payee AL Media LLC Date of Dissemination	nn: 10/24/18			Date of Public Distribution/Dissemination
Mailing Address 222 W Ontario St	J 10/2 # 10			
Suite 600				Amount
City	State	Zip Code		131250.00
Chicago	U.	60654		Transaction ID : SE-953187  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy	·	Category/ 004		"10" · 321" · 2016
Name of Federal Candidate		Support	Offic	e Sought: House District: 00
Oonald J. Trump		Cpose	X	President Senate State:
Calendar Year-To-Date Per Election for Office Sought	;	3653174.81	Disb 2016	ursement For: Primary General Cother (specify)
(a) SUBTOTAL of Itemized Independent Expendent (b) SUBTOTAL of Unitemized Independent Expendent				176250.00
(c) TOTAL Independent Exponditures			<b>&gt;</b>	,
Under penalty of perjury I cartily that the indept with, or at the request or suggestion of, any can party committee) any political party committee or	didate or author	res reported herein were lzed committee or agent of	not ma	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
Relie C. Ward	•		,	u ( :
Signature		Date	R 1	0 25 2016

(Schedule E) PAG	E 52 OF 60 "
	SE OF FORM 24/48
NAME OF COMMITTEE (in Full)	FICATION NUMBER T
DCCC C0000	00935
Check if 24-hour report 48-hour report New report Amends report filed on	· • • • • • • • • • • • • • • • • • • •
	ribution/Dissemination
Screen Strategies Media, LLC Date of Dissembation: 10/25/16 10 2	25 2016
Mailing Address 11150 Fairfax Blvd	
Suite 505	
City State Zip Code	64326.00
Fairfax VA 22030 Transaction ID : SE	E-953184 ant or Obligation
Purpose of Expenditure Media Buy  Category/ Type 004 10 2	21 2016
Name of Federal Candidate   Support Office Sought: Hou	use District: 00
Donald J. Trump X: Oppose X President Sar	nale State:
Calendar Year-To-Dale Disbursement For:	Primary X General
Por Election for Office Sought 4369947.93 2016 Other (specify)	
	ribution/Dissemination
Puving Time 11.C	25 2016
Date of Dissemination: 10/25/16 10 2 Mailing Address 650 Massachusetts Avenue, NW	25 2016
Suite 210	
City State ZIp Code	62488.00
Washington DC 20001 Transaction ID : SE- Oate of Disbursame	
Purpose of Expenditure  Media Buy  Category/ Type  004  10  2	21
Name of Federal Candidate Support Office Sought: Hot	use District: 00
Donald J. Trump X: Oppose X: President. Ser	
Calendar Year-To-Date Disbursement For:	Primary X General
Per Election for Office Sought 4369947.93 2016 - Other (specify)	<u> </u>
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
(b) SUBTOTAL of Uniternized Independent Expenditures	-
(c) TOTAL Independent Expenditures	,
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, cowith, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting of party committee) any political party committee or its agent.	
Kelly C. Ward	
Date 10 25	2016

24/48 HOUR REPORT OF INDEPENDEN	IT EXPE	NDITURES			PAGE 8	OF 8
(Schedule E)						F FORM 24/48
NAME OF COMMITTEE (In Full)	<del></del> -			FEC I		ION NUMBER Y
DCCC	_			l _		
				C	C00000935	
Check if 24-hour report 48-hour report	X New	report Amends rep	ort filed on	. <u> </u>	i n e	· ,
Full Name of Payee		<del></del>	Date	of Publ	ic Distribution	√Dissemination
Screen Strategies Media, LLC				" 10 <sup>"</sup>		
Date of Olssemination: 1 Mailing Address 11150 Fairfax Blvd	10/31/16	· · · · · · · · · · · · · · · · · · ·		10	31	2016
			Amo	unt	•	
Suite 505	: — <u>_</u>	<del></del>				
City	State	Zip Code		,		55000,00
Fairlax	VA	22030			ID : SE-9532 ursement or	
Purpose of Expenditure Media Brry		Category/ Type 004			25	· ·
Name of Federal Candidate		Support	Office Soug	ht: :	House	District: 00
Donald J. Trump		X Oppose	-	-		
		Oppose	X Presid		: Senate	State:
Calendar Year To Date Per Election for Office Sought	:	4979620.65	' 2016		Priman Priman 	y Kaneral
Full Name of Payee	· · · · · · · · · · · · · · · · · · ·		Date	of Publ	lic Distribution	√Dissemination
AL Media LLC		•			. "31"	
Date of Dissemination:	10/31/16			10 -	31	2016
Mailing Address 222 W Ontario St			Amo	unt		
Suite 600						
City	State	Zip Code	i :	,	, ,	115875.00
Chicago ,	IL	60654			D : SE-95417 Juisement or	
Purpose of Expenditure Media Bny		Category/ 004		້10່		
Name of Federal Candidate	<del></del> -	Support	Office Soug	hr:	House	District: 00
Donald J. Trump		·X, Oppose	1	-	Sonate	
	<del></del>	·V! obbose				
Calendar Year To-Date Per Election for Office Sought		4979620-65	2016		Primar pecify) 🟲	y X General
(a) SUBTOTAL of Itemized Independent Expenditure	es		··· <b>&gt;</b>			170875.00
				•	*	
(b) SUBTOTAL of Unitemized Independent Expendit	tures	***************************************	🖕			
,			•	•	r	
(c) TOTAL Indopendent Expanditures	****************		··· •		,	433711.75
Under penalty of perjury I certify that the independently with, or at the request of suggestion of, any candidated party committee or its	ate or author	res reported herein were ized committee or agent of	not made in of either, or (if	coopara the rep	tion, consultationing entity	ation, or concert is not a political
· Malle for Illians					. <b>"i</b>	
Kelly C. Ward Signature		Dete	e 10 '	31	20	16

24	4/48 HOUR REPORT OF INDEF	ENDENT EXPENDI	TURES			· · · · · · · · · · · · · · · · · · ·
(S	chedule E)				PAGE	10 OF 11 E OF FORM 24/48
N/	AME OF COMMITTEE (In Full)	<del></del>	<del></del>			
	OCCC				C C00000	CATION NUMBER ▼
CI	neck if 🗶 24-hour report 🔲 48-hour	report K New repo	ort Amends repo	ort filed on	, , ,	
-	Full Name of Payee Screen Strategies Media, L	LC emination: 11/04/16		Date	of Public Distrib	
	Malling Address 11150 Fairfax Blvd		· · · · · · · · · · · · · · · · · · ·	Amou		2016
	Suite 505				<del></del>	
	Cily Fairfax	State · VA	Zip Code 22030		action ID : SE-	
	Purpose of Expenditure Media Buy		Category/ 004		10 27	Marting 1 1
•	Name of Federal Candidate		Support	Office Sough	nt: Hous	e District: 00
	Trump, Donald, J., ,		x Oppose	× Presid	ent Sena	ile State:
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursemer 2016 C	nt For: Pri	mary K General
	Full Name of Payee AL Media LLC	•		Date	of Public Distrib	ution/Dissemination
		emination: 11/04/16		[	11 04	2016
	Mailing Address 222 W Ontario St			Amou	int	and the Standard
	Suite 600			r-,		
	City Chicago	Slate IL	Zip Code 60654		action ID : SE-9 of Disbursemen	
	Purpose of Expenditure Media Buy	<u> </u>	Category/ 004		11 04	P. S.
	Name of Federal Candidate		Support	Office Sough	ht: Hous	se District: 00
	Trump, Donald, J., ,		K Oppose	× Presid	lent Sena	ile State:
	Calendar Year-To-Date Per Election for Office Sought		6419383.70	Disbursemen 2016	nt For: Pr Other (specify) ▶	imary 🗷 General
	(a) SUBTOTAL of Itemized Independent	Expenditures				43750.00
	(b) SUBTOTAL of Unitomized Independent	nt Expendituros		. >	aganganga ndawitanta	وسوسوسوسوس
	(c) TOTAL Independent Expenditures			•		
	Under penalty of perjury I certify that the with, or at the request or suggestion of, a party committee) any political party comm	any candidate or authorized	reported herein were committee or agent o	not made in o	cooperation, cor the reporting er	sultation, or concert ntity is not a political
	Ward, Kelly, C., .	[Electroni	ically Filed/ Date	11	04	2016
1	Signature			L-1	Indianal Inc.	أنسانساست

Image# 201611049037121059 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	
(Schedule E)	PAGE 9 OF 11
NAME OF COMMITTEE (In Full)	FOR SE OF FORM 24/48
DCCC	FEC IDENTIFICATION NUMBER ▼
·	C c00000935
Check if X 24-hour report 48-hour report New report Amends report	t filed on
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 11/04/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfex Blvd	11 3 04 2016
Suite 505	Amount
City . State Zip Code	13000.00
Fairfax VA 22030	Transaction ID : SE-954882  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Od4	11 03 2016
Name of Federal Candidate Support	Office Sought: House District: 00
Trump, Donald, J.,	x President Senate State:
Calendar Year-To-Date	Disbursement For: Primary X General
Per Election for Office Sought 6419383.70	2016 Other (specify) ▶
Full Namo of Payee	Date of Public Distribution/Dissemination
The New Media Firm, Inc. Date of Dissemination: 11/04/16	11 04 2016
Mailing Address 1730 Rhode Island Ave., NW	
Suite 213	Amount
	46000.00
City State Zip Code Washington DC 20036	Transaction ID: SE-954883  Date of Disbursement or Obligation
Purpose of Expenditure Category/	The way to a bat the sound of
Media Buy  Type 1004	11 03 2016
Name of Foderal Candidate Support	Office Sought: House District: 00
Trump, Donald, J., ,	K President Senate State:
Calendar Year-To-Date	Disbursement For: Primary 🗶 General
Per Election for Office Sought 6419383.70	2016 ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	59000.00
(b) SUBTOTAL of Uniternized Independent Expenditures	terretorne transfer standar witness transfer to the second
(b) GOD TO THE G. STINCHIES THE STINCH ENGLISH SHIP STINCH SHIP SHIP SHIP SHIP SHIP SHIP SHIP SHI	handandras Timber April Timber Americanton
(c) TOTAL Independent Expenditures	har hard and make the standard and and and and and
(,, , , , , , , , , , , , , , , , , , ,	law James March March 1 19 and and a firm of the sales of
Under penalty of perjury I certify that the Independent expenditures reported herein were n with, or at the request or suggestion of, any candidate or authorized committee or agent of party committee) any political party committee or its agent.	not made in cooperation, consultation, or concert elither, or (if the reporting entity is not a political
Ward, Kelly. C., ,  Electronically Filed  Date	11 04 2016
Signature	المختف المختف المختف

Image# 201612089039916524

## SCHEDULE E (FEC Form 3X) ITEMIZED INDEPENDENT EXPENDITURES

- The state of the	•					024 OF 1091.07 24 OF FORM 3X
AME OF COMMITTEE (In Full)	<del></del> -	<del> ·</del>	-	EEC II		ION NUMBER Y
DCCC				1 _		•
				C	C0000093	5
neck if 24-hour report : 48-hour report	New rep	on Amends repo	od lileo	on	•	
Full Name of Payee Screen Strategies Media, LLC	<del></del>	, Memo	Kam	Date of Publi	c Distributio	n/Dissemination
Date of Dissemination: 11/07/16 - 24 hours prior to	election day			11	07.	2016
Mailing Address 1'1150 Fairfax Blvd				Amount		
Suite 505	Lower	1 75: 6:4:				29.72.50
City	State	Zip Code 22030		Transaction	ID - 85 064	38173.50
Fairfax	VA	22030		Date of Disbu		
Purpose of Expenditure Media Buy		Category/ Type (904	1	11	01	2616
Name of Federal Candidate:		Support	Office	Sought:	House	District:
Trump, Danald, J.,		× Oppose	×	P:esident	Senate	State:
Calendar Year-To-Date Per Election for Office Sought		6693372.69	Dishi 2016			ry `.≭ General
		<del></del>	<u>.                                    </u>			<del></del> .
Full Name of Payed The New Media Firm, Inc. Date of Dissemination: 11/01/16		Memo	Itern	Date of Publi	c Distribution	n/Dissemination
Mailing Address	•	. ,		`'	Ŭ.	20111
1730 Knode Island Ave., NVV				Amount		
Suite 213	State	Zin Code				3568.00
Washington	DC	20038		; Transaction Date of Disbi		
Purpose of Expenditure	<del></del>	Category/		11	01	, ,
Media Production .		Type 004	1	11	01	2016
Name of Federal Candidate:	<del></del>	Support	Office	e Sought:	House	District:
Trump, Donald, J., ,		x Oppose	×	Presiden!	Schale	State:
Catendar Year-To-Date Per Election for Office Sought		6693372.69	Disbu 2016	ursement For:	Prima	ry K General
Fer Cleans in Cince Sough	<u> </u>	<u> </u>	<u> </u>	Other (s	pecify) 🕨 🔃	
(a) SUBTOTAL of Itemized Independent Expenditure	S 111. 1400	. Algorithmos we where IML of Tip o	. •			41739.50
(a) SUBTOTAL of Uniternized Independent Expenditu	F65		· <b>&gt;</b>	-		
(a) TOTAL Independent Expenditures		·····	•			· · · · · · · · · · · · · · · · · · ·
Under penalty of perjury I certify that the independ with, or at the request or suggestion of, any candid party committee) any political party committee or its	iate or authorize	s reported herein were d committee or agent	nol m of eithe	ade in coopera	ation, consult porting entity	ation, or concert is not a political
Ward Kelly, C.,	/Electronically F	iled) Date		2 03	21	)16

24/48 HOUR REPORT OF INDEPENDEN	T EXPEN	DITURES		
(Schedule E)				PAGE 51 OF 52 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Pul)			¹ FE	C IDENTIFICATION NUMBER V
DCCC .			,,,,	C00000935
				, 000000933
Check if 24-hour report 48-hour report	X New re	port Amends rep	ort filed on	) * 12 * 4
Full Name of Payer			Date of P	ublic Distribution/Dissemination
Screen Strategies Media, LLC Date of Dissemination: 1	0/18/16		10	18 2016
Malling Address 11150 Fairfax Blvd			A	
Suite 505			Amount	
City	Slate	Zip Code		134898.50
Fairfax	VA	22030	Transacti Dale of D	lon ID : SE-952377 isbursøment or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004	L .	i ar ve
Name of Federal Candidato		Support		House District: 00
Donald J. Trump		— Support		<del></del>
			President	Senale State:
Catendar Yoar-To-Date Per Election for Office Sought		2613000.20	Disbursement Fo	r: Primary K General
	, ,		] Clher	(specify) ▶
Full Name of Payee Kully Hall, LLC				ublic Distribution/Dissemination
Date of Dissemination: 1	0/18/16			18 2016
Mailing Address 1932 1st Ave. Suite 203			Amouni	
City	Siate	Zip Code		6225.00
Scattle	WA	98101		on ID: SE-952379 Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production		Category/ Typo		18 2016
Name of Federal Candidate		Support	Office Sought:	House District: 00
Donald J. Trump		Х. Оррозе		Senate State:
		- XX, oppos		or: Primary X General
Calendar Year-To-Date Per Election for Office Sought		2613000.20	1 2016 <b>–</b>	
· Si Elecion to Cined Cong.	<u>,                                     </u>		Other	(specily) ▶
(a) SUBTOTAL of Itemized Independent Expenditure	3		··· ▶	141123.50
_				
(b) SUBTOTAL of Uniternized Independent Expendit	ures		··· <b>•</b>	
(a) TOTAL I described 5 on discon-				
(c) TOTAL Independent Expenditures	.,	***************************************	··· <b>&gt;</b>	•
<del></del>		<del></del>	<del>,</del>	<del></del>
Under penalty of perjury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ite or authorize	s reported harein ware ed committee or agent	not made in coop of either, or (if the	eration, consultation, or concert reporting entity is not a political
Kelly C. Ward			29 26 4	• • •
		Dat		19 2016
Signature			•	

Signature

	ege# 201610139032426300 /48 HOUR REPORT OF IND	EPENDENT EXPEND	ITURES		
	chedule E)				PAGE 3 OF 3 FOR SE OF FORM 24/48
NΑ	ME OF COMMITTEE (In Full)	<del></del>	<del></del>		<del></del>
	CCC				FEC IDENTIFICATION NUMBER ▼
		······			C1 C00000935
Ch	eck if   24-hour report     48-ho	our report X New repo	ort [ ] Amends rep	ort filed	tou Land Land
	Full Name of Payee Buying Time, LLC	issemination; 10/11/16			Date of Public Distribution/Olssemination  Tu fu ju n Tu ju t v v v v v v v v v v v v v v v v v v
	Mailing Address 650 Massachusetts				10 { 11 } { 2016 }
ı	Suite 210	rvenuo, Irvv			Amount
ŀ	City	State	Zip Code		57500.00
	Washington	DC	20001	_	Transaction ID : SE-951439  Date of Disbursement or Obligation
	Purposo of Expenditure Media Buy	•	Cutogory/ Type 004		10 11 2016
	Name of Federal Candidate		Support	Office	e Sought: House District: 00
	Trump, Donald, J., ,		🗶 Oppose	X	President Senate State:
	Calondar Year-To-Date Per Election for Office Sought	to all all and and the	1459931.62	Disbu 2016	usement For: Primary  General Other (speelfy) >
ı	Full Name of Payee	<del></del>	····		Date of Public Distribution/Dissemination
	Screen Strategies Media, L	LC issemination: 10/12/16	_,,,,		10 12 2016
	Mailing Address 11150 Fairfax Blvd	١.			Amount
ı	Suite 505	Clair	Zip Code		74632.00
	Cily Fairfax	State VA	22030		Transaction ID : SE-951438  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy		Calegory/ Type 004		10 11 2016
	Name of Federal Candidate		Support	Offic	o Sought: House District: 00
	Trump, Donald, J., ,		(x) Oppose	x	President Senato State:
i	Calendar Year-To-Oate Per Election for Office Sought	والمادية والمدالة وال	1534583.62	Disb 2016	ursement For: Primary X General Other (specify) >
	(a) SUBTOTAL of Itemized Independe	nt Expenditures		·· >	132132.00
	(b) SUSTOTAL of Unitemized Indeper	ident Expenditures		·· •	7 - 7 1
	(c) TOTAL Independent Expenditures.		***************************************	·· •	170032.00
	Under penalty of perjury I certify that with, or at the request or suggestion operly committee) any political party col	f, any candidate or authorized	reported herein were committee or agent of	not ma	ade in cooperation, consultation, or concert' or, or (if the reporting entity is not a political
	Ward, Kelly. C	[Flantwoon	icalis Filmii - D-se	. ".	

	I/48 HOUR REPORT OF INDEPENI chedule E)	DENT EXPEND	ITURES			PAGE 17	OF 17
	· · · · · · · · · · · · · · · · · · ·					FOR SE O	F FORM 24/48
	AME OF COMMITTEE (In Full)		•		FEC		ON NUMBER ¥
	)COC				C,	C00000935	ay sang saun ing Bilingsi Pangan
CI	heck if 24-hour report 48-hour report	New rep	ort Amends repo	ort filed o	u u u u	11076	1 v ** 4 · v
	Full Name of Payoo Screen Strategies Media, LLC				Date of Pub	lic Distribution	/Oissemination
	Date of Disseminar	ilon: 10/20/16			10	20	2016
	Mailing Address 11150 Fairfax Blvd Suite 505				Amount		
	City	State	Zip Code			,,	107040.00
	Fairfax	VA	22030			n ID : SE-9523 Dursement or (	
	Purpose of Expanditure Media Buy		Category/ 004		, 10 , 7.	18	2016
•	Name of Federal Candidate		Support	Office 5	Sought:	House	District:00
	Donald J. Trump	· · · · · · · · · · · · · · · · · · ·	Coppose		President	Senate	State:
	Calendar Year-To-Date Per Election for Office Sought	, , , , , , , , , , , ,	989611.20	Disburs 2016	oment For:	Priman Specify) ►	General
	Full Name of Payee			1	Date of Pub	dic Distribution	/Oissemination
	AL Media LLC  Date of Disseminal	lion: 10/20/16			" 10 <sup>M</sup>	20 .	2016
	Mailing Address 222 W Onterio St			İ	Amount	•	
	Suite 600	State	Zip Code	<del></del>	•	·,	140250.00
	City Chicago	IL	60654			ID : SE-95207	1
	Purpose of Expenditure Media Buy		Category/ 004		. 10	17 17	2016
	Name of Federal Candidate		Support	Office	Sought:	House	District: 00
	Donald J. Trump		i∑ Oppose	X	President	Senate	State:
	Calendar Year-To-Date Fer Election for Office Sought	اسم ا	2989611.20	Olsburs 2016	sement For: Other (a	·	/ Ki General
	(a) SUBTOTAL of Itemized Independent Exper	nditures		·· <b>&gt;</b>	,	·•• ,	247290.00
	(b) SUBTOTAL of Unitemized Independent Exp	penditures	œ44 47 F F F F F F F F F F F F F F F F F	·· <b>•</b>		. 7	•
	(c) TOTAL Independent Expenditures			" ▶	·	, ,	652070.38
	Under penalty of perjury I certify that the indef with, or at the request or suggestion of, any ca- party committee) any political party committee of	indidate or authorized	reported herein were I committee or agent o	not mad of either,	e in coopera or (if the rap	ation, consulla porting entity i	tion, or concert s not a political
	Kelly C. Ward		_ Date	м : э 10	21	201	ψ 'Ψ' (
	Signature			••			

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES Schedule E)	PAGE 15 OF 15
NAME OF COMMITTEE III FAIR	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)  DCCC	FEC IDENTIFICATION NUMBER ▼
	C c00000935
Check it 24-hour report 48-hour report New report Amends report lilt	ed on
Full Namo of Payee	Date of Public Distribution/Dissemination
Prism Communications, Inc. Date of Dissemination: 10/27/16	7 <sub>2</sub> · 10 · 10 · 27 · 2016
Malling Address 1000 Polomac Street, NW	]
Suite 420	Amount
City State Zip Code	3291.58
Washington DC 20007	Transaction ID : SE-953927 Date of Disbursement or Obligation
Purpose of Expenditure Media Production  Category/ Type  004	10 26 2016
Name of Federal Candidate Support Offi	ice Sought: House District: 00
Donald J. Trump Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  Dis 201	bursement For: Primary IXI General  6  Other (specify) ▶
Full Name of Payee 76 Words Corp.  Date of Dissemination: 10/26/16	Date of Public Distribution/Dissemination
	_ 10 26 2016 .
The following the	Amount
Floor#1	5500.00
City State Zip Code Washington DC 20001	5500.00 Transaction ID : SE-954171 Date of Disbursement or Obligation
Purpose of Expandituro Media Production  Category/ Type  Out	10 27 2016
Name of Federal Candidate   Support Off	ice Sought:     House District: 00
Donald J. Trump . I Oppose	Y President Senate State:
Per Election for Office Sought 4436718.92 20	
**** *** A	Other (spacify) ▶
(a) SUBTOTAL of Itemized Independent Expanditures	8791.58
(b) SUBTOTAL of Unitemized Independent Expenditures	* * * * * * * * * * * * * * * * * * *
(c) TOTAL Independent Expenditures	771178,77
Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of eith party committee) any political party committee or its agent.	made in cooperation, consultation, or concart ner, or (If the reporting entity is not a political
Kally C. Word	u· 11
Signatur8 Date	- * *

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURE (Schedule E)	S	PAGE 22 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		<del></del>
DCCC		FEC IDENTIFICATION NUMBER V
	····	C C00000935
Check if 24-hour report 48-hour report New report	Amends report filed on	THE STATE OF STATES
Full Name of Payee Kully Hall, LLC		Date of Public Distribution/Dissemination
Date of Dissemination: 10/12/16		10 12 2016
Mailing Address 1932 1st Ave, Sulte 203	A	Amount
City State Zip Cod	ia .	4297.00
Seattle WA 98101	TI TI	ransaction ID : SE-951665 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Catego Ty		10 14 2016
Name of Federal Candidate	Support Office Se	ought: House District: 00
Donald J. Trump	Oppose Pr	resident Senate State:
Calendar Year To Date Per Election for Office Sought 1721688.30	Oisburse 2016	ement For: Primary General
To Election of Office Sought	· -'a. i	Other (specify)
Full Name of Payes The New Media Firm, Inc. Date of Olssemination: 10/12/16		Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Avo., NW		and the first of displaying t
Suite 213	^	Amount
City State Zip Cod	ie .	56930.43
Washington DC 20036	Tre	ransaction ID : SE-951566 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Catego Ty		10 12 2016 }
Name of Federal Curididate	Support Office S	lought:   House District: 00
Donald J. Trump	Oppose X Pr	resident Senato State:
Calendar Year To-Date Per Election for Office Sought	Disburse 2016	ement For:   Primary   General
Per Election for Office Sought 1		Other (spocify) ▶
(a) SUBTOTAL of Itomized Independent Expenditures	•	61227.43
(b) SUBTOTAL of Unitemized Independent Expenditures	······· <b>&gt;</b>	
(c) TOTAL Independent Expenditures	<b>•</b>	
Under penalty of perjury I certify that the independent expenditures reported with, or at the request or suggestion of, any candidate or authorized committee party committee) any political party committee or its agent.	herein were not made ee or agent of either, o	in cooperation, consultation, or concert or (If the reporting entity is not a political
Kelly C. Ward	Date 10	14 2016
Signature	<b>*</b> *****	!

## Image# 201610149032527772 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule F)

Schedule E)	PAGE 21 OF 25 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC	FEC IDENTIFICATION NUMBER V
Check if 24-hour report 48-hour report New report Amends report filed	on M. M. / O. O. / W. V. V. V.
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 1730 Rhode Island Ave., NW	Amount
Suite 213	للهيام المعاصر والمنطوع والمستومات بريبا المتعمل المازي الأرا
City State Zip Code Washington DC 20036	4047.25 Transaction ID : SE-951654 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy Media Production  Category/ Type	10 12 2016
Name of Federal Candidate Support Office	Sought: House District: 00
Trump, Donald, J., ,	President Senate State:
Calendar Year-To-Date Per Election for Office Sought  1721688.30  2016	rsement For: Primary ☑ General Other (specify) ▶
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd	Amount
Suite 505	
City Slate Zip Code Fairfax VA 22030	Transaction ID : SE-951660 Date of Disbursement or Obligation
Purpose of Expenditure Media Buy  Category/ Type  Out Type	10 12 2016
Towns Bossid I	Sought: House District: 00
C Oppose A	
Calendar Year To-Date Per Election for Office Sought  Disb 2016	ursement For: Primary 🗶 General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25
(b) SUBTOTAL of Uniternized Independent Expenditures	per personal and a second seco
(c) TOTAL Independent Expenditures	والمستوات والمست
Under penalty of perjury I certify that the independent expenditures reported herein were not mi with, or at the request or suggestion of, any candidate or authorized committee or agent of eithe party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert r, or (if the reporting entity is not a political
IVard, Kelly, C., . [Electronically Filed] Date 1	0 14 2016
Signature	

## Image# 201610189033039655 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

(Schedule E)	FOR SE OF FORM 24/48		
NAME OF COMMITTEE (In Full)  DCCC	FEC IDENTIFICATION NUMBER ▼  C C00000935		
Check if 24-hour report  New report  Amends report tiled	on 10 14 2016		
Full Name of Payee The New Media Firm, Inc. Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination		
Mailing Address 1730 Rhode Island Ave., NW	formed to contract		
Suite 213	Amount		
City State Zip Code Washington . DC 20036	4047.25 Transaction ID : SE-952372 Date of Disbursement or Obligation		
Purpose of Expenditure Media Buy Media Production  Category/ Type	10 14 2016		
Name of Federal Candidate Support Office	e Sought: House District: 00		
Trump, Donald, J., ,	President Senate State:		
Calendar Year-To-Date Per Election for Office Sought  Disbu	ursement For: Primary 🗶 General  Other (specify) ▶		
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination: 10/12/16	Date of Public Distribution/Dissemination		
Mailing Address 11150 Fairfax Blvd Suite 505	Amount		
City State Zip Code	121850.00		
Fairfax VA 22030	Transaction ID : SE-952373  Date of Disbursement or Obligation		
Purpose of Expenditure Media Buy  Category/ Type  O04	10 14 2016		
Name of Federal Candidate Support Office	e Sought: House District: 00		
Trump, Donald, J., ,			
Calendar Year-To-Date Per Election for Office Sought  Disb 2016	ursement For: Primary 🗶 General  B Other (specify) ▶		
(a) SUBTOTAL of Itemized Independent Expenditures	125897.25		
(b) SUBTOTAL of Unitemized Independent Expenditures			
(c) TOTAL Independent Expenditures	American Service of the Commence	Under penalty of perjury I certify that the independent expenditures reported herein were not me with, or at the request or suggestion of, any candidate or authorized committee or agent of either party committee) any political party committee or its agent.	ade in cooperation, consultation, or concert er, or (if the reporting entity is not a political
Ward, Kelly, C., [Electronically Filed] Date	10 18 2016		
0.g. (b. 1.)			

	I/48 HOUR REPORT OF INDEPENDENT EXPENDITION (1/48)	TURES		PAGE 3 OF 3
			المريادية المراجع المراجع	FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full) DCCC		Fi	EC IDENTIFICATION NUMBER V
			1	C) C00000935
C	neck If 24-hour report X 48-hour report X New repor	rt [ ] Amends repo	rt filed on	mil 1 to so I the mappeness
	Full Name of Payès Buying Time, LLC		Date of	Public Distribution/Dissemination
	Date of Dissemination: 10/11/16		j 10	11 2016
	Mailing Address 650 Massachusetts Avenue, NW		Amount	
	Suite 210			and the second s
		Zip Code	1	57500.00 filon ID : SE-951439
	Washington DC	20001 	Date of	tion ID : SE-951439 Disbursement or Obligation
	Purpose of Expenditure Media Buy	Category/ Type 004	i	11 2016
	Name of Federal Candidate	Support	Office Sought:	House District: 00
	Oonald J. Trump	Oppose	President	Senate State:
	Calendar Year-To-Date		Disbursement F	or: Primary X General
	Per Election for Office Sought	9931.62	2016 [ ] Olhe	r (spocify) >
	Full Name of Payee		Date of	Public Distribution/Dissemination
	Screen Strategies Media, LLC Duto of Dissemination; 10/12/16		100	12   2016
	Mailing Address 11150 Fairfax Blvd		سا ا	المستقدية المحسا
	Suite 505		Amount	ومعمور خبر والموادة الموادة
	Cliy State 2	Zip Code		74632.00
	Fairfax VA	22030	Transacti	on ID : SE-951438 Disbursement or Obligation
	Purpose of Expenditure Modia Buy	Category/ 004	10	אין אין אין אין אין אין אין אין אין אין
				السنانيسهوسفيسة المسايسة
	Name of Fodoral Candidate	Support	Office Sought:	House District: 00
	Donald J. Trump		President	The second secon
	Calendar Year To-Date Per Election for Office Sought	1534563.62	Disbursement F 2016 Other	or: Primary General
			· ,	
	(a) SUBTOTAL of Itemized Independent Expenditures		•	132132.00
	(b) SUBTOTAL of Uniternized Independent Expenditures		•.	,
	(a) 300 101AE of Officeritzes Procedures Capationales III	. 11 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	·	nak ili sedan kine damatan k
	(c) TOTAL Independent Expenditures			170032 00
				ال المستقدمات المالية
,	Under panalty of perjury I certify that the independent expenditures rewith, or at the request or suggestion of, any candidate or authorized coarty committee) any political party committee or its agent.	aported herein were of	not made in coop either, or (if the	peration, consultation, or concert reporting entity is not a political
	Kelly C. Ward			
	Signature	Dale	; 10 ;	13 2016
	อานูกสานาซ			ļ

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES  (Schedule 5) PAGE 50 OF 80					
(50	chedule E)				FOR SE OF FORM 24/48
	ME OF COMMITTEE (In Full)			F	EC IDENTIFICATION NUMBER T
טו	OCCC			3,	C C00000935
Ch	eck if     24-hour report   48-hour report	New rep	ort Amonds repo	ort filed on	4 1 1 9 4 11 1 2 2 4 4 4 4 4 4 4 4
	Full Name of Payee Screen Strategies Media, LLC		<del></del>	1	Public Distribution/Dissemination
	Date of Dissemination: 1	0/25/16			25 2016
	Mailing Address 11150 Fairfax Blvd			Amount	
	Suite 505				e e e e e e e e e e e e e e e e e e e
	City Falrfax	State VA	Zip Code 22030		121850.00 tion ID : SE-952386
	Purpose of Expenditure		Category/		Disbursement or Obligation
	Media Buy		Type , 004	. 1	2016
	Name of Federal Candidate		Support	Office Sought:	House District: 00
	Donald J. Trump		Oppose	President	
	Catendar Year-To-Date Per Election for Office Sought	.43	69947.93	Disbursement F	1
	Sill Name of Box	<u></u>			or (specify) >
	Full Name of Payee Buying Time, LLC Date of Dissemination:	10/35/16			Public Distribution/Dissemination
ı	Mailing Address 650 Massachusetts Avenue, NW				2016 [
	Suite 210			Amount	
j	City	State	Zip Code		19691.00
	Washington	DC	20001		Ion ID : SE-953229 Disbursement or Obligation
	Purpose of Exponditure Media Buy		Calegory/ 004	1 11	2016
	Name of Federal Candidate		Support	Office Sought:	House District: 00
- 1	Donald J. Trump		X  Oppose	Presiden	Senate State:
	Calendar Year-To-Dato		4369947.93	Disbursement I	For: [ ] Primary X General
	Per Election for Office Sought ,	, ,	100001	Oth	er (specify) >
	(a) SUBTOTAL of Itemized Independent Expenditure	BS	,	· • 1	141541.00
	(b) SUBTOTAL of Unitemized Independent Expandit	lures			
				i	The state of the s
	(c) TOTAL Independent Expenditures			· • · · · ·	Secretary Secretary
١,	Under penalty of perfury I certify that the independe with, or at the request or suggestion of, any candida party committee) any political party committee or its	ate or authorized	reported herein were committee or agent o	not made in coo f cither, or (if the	peration, consultation, or concert reporting entity is not a political
	Kelly C. Wurd		. Date	10 10	25 2016

	1/48 HOUR REPORT OF INDEPENDENT EXPENDITURES	PAGE 57 OF 57
`	chedule E) , , , , , , , , , , , , , , , , , ,	FOR SE OF FORM 24/48
	AME OF COMMITTEE (In Full)	FEC IDENTIFICATION NUMBER ▼
_		C C00000935
CI	heck If 🔀 24-hour report 🔲 48-hour report . New report 🔲 Amends report to	lied ou and 1 1 2 and 1 1 2 and 1 2 and 1
	Full Name of Payee  Buying Time, LLC  Date of Dissemination: 11/01/16	Date of Public Distribution/Dissemination
	Mailing Address 650 Massachusetts Avenue, NW	
	Sulta 210	Amount
	City State Zip Code	:7175.00
	Washington DC 20001	Transaction ID : SE-954373 Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy  Gategory/ Type  G04	3 10 28 2016
	Paneld J. Tarray	ffice Sought: House District: 00
		President Senate State:
		sbursement For:   Primary   General    16   Other (specify) ▶
	Full Name of Payee Screen Strategies Media, LLC Dato of Dissemination: 11/01/16	Date of Public Distribution/Dissemination
	Mailing Address 11150 Fairfax Blvd	Amount Control Control
	Suite 505	74850.00
	City State Zip Code Fairfax VA 22030	Transaction ID : SE-954175  Date of Disbursement or Obligation
	Purpose of Expenditure Media Buy  Category/ Type  004	10 27 2016
	Name of Federal Candidate Support O	flice Sought: House District: 00
	Donald J. Trump 💢 Oppose	President Senate State:
	Calendar Year-To-Date Per Election for Office Sought	isbursement For: Primary   X Goneral   016   Other (specily) ▶
	(a) SUBTOTAL of Itemized Independent Expenditures	92025.00
	(b) SUBTOTAL of Unitemized Independent Expenditures	annyma yan eye eyen ayan ayan ayan ayan ayan
	(c) TOTAL Independent Expenditures	14333615.05
	Under penalty of perjury I certify that the independent expenditures reported herein were not with, or at the request or suggestion of, any candidate or authorized committee or agent of all party committee) any political party committee or its agent.	
	Kelly C. IVard	11 02 2016
	Signature	The state of the s

Image# 201611069037127397		
24/48 HOUR REPORT	OF INDEPENDENT	<b>EXPENDITURES</b>
(Schedule E)		

Schedule E)	INI EAPEN	DITUNES		PAGE 11 OF 12 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC			-	FEC IDENTIFICATION NUMBER ▼ C C00000935
Check if 24-hour report 48-hour report	X New I	report Amends repo	ort filed o	" [nzn] , [oze] , [vzvzvzv]
Full Name of Payee Screen Strategies Media, LLC Date of Dissemination	ı: 11/05/16			Date of Public Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505				Amount
City Fairfax	State VA	Zip Code 22030		58700.00  Fransaction ID : SE-954453  Date of Disbursement or Obligation
Purpose of Expenditure Media Buy		Category/ Type 004		10 / 31 / 2016
Name of Federal Candidate Trump, Donald, J., ,		Support  M Oppose	Office \$	Sought: House District: 00 President Senate State:
Calendar Year-To-Date Per Election for Office Sought	georgeorgeorgeorgeorgeorgeorgeorgeorgeor	6526208.19	Disburs 2016	ement For: Primary Seneral Other (specify) >
Full Name of Payeo Canal Partners Media, LLC Date of Dissemination	n: 11/06/16			Date of Public Distribution/Dissemination
Mailing Address 25 Whitlock Place Suite 200				Amount
City Marietta	State GA	Zip Code 30064		7910.00 ransaction ID : SE-954884 Date of Disbursoment or Obligation
Purpose of Expenditure  Media Buy		Category/ Type 004		11 03 2016
Name of Federal Candidate  Trump, Denaid, J., ,		Support Oppose	!	Sought: House District: 00  President Senate State:
Calendar Year-To-Date Per Election for Office Sought	gangangangan	6648199.19	Disbur 2016	sement For:  Primary
(a) SUBTOTAL of Itemized Independent Expendi	lures		<b>.</b> [	66610.00
(b) SUBTOTAL of Unitermized Independent Exper	nditures		<b>.</b>	
(c) TOTAL Independent Expenditures			·· •	
Under penalty of perjury I certify that the independent of all the request or suggestion of, any canon party committee) any political party committee or	lidate or authori	res reported herein were zed committee or agent o	not mad of either,	e in cooperation, consultation, or concert or (if the reporting entity is not a political
Ward, Kelly, C	[Elect	ronically Filed Date	e 11	06 / 2016
	. سال سال سال سال ال			

į

lmage# 201610189033039653

24/48 HOUR REPORT OF INDEPENDENT EXPENDIT( (Schedule E)	URES	PAGE 19 OF 25
` <u> </u>		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) DCCC		FEC IDENTIFICATION NUMBER ▼
		C c00000935
Check if 24-hour report	x Amends report fil	ed on 10 14 2016
Full Name of Payee Ralston Lapp Media, LLC		Date of Public Distribution/Dissemination
Date of Dissemination: 10/14/16  Mailing Addross 1054 31st Street, NW		10 14 2016
Suite 430		Amount
	p Code	12260.71
I. '	0007	Transaction ID : SE-951677 Date of Disbursement or Obligation
Purpose of Expenditure Media Production	Calegory/ Type 004	10 14 7 2016
Name of Federal Candidate	Support Of	fice Sought: K House District: 23
Hurd, William, , ,	X Oppose	President Senate State: TX
Calendar Year-To-Date Per Election for Office Sought		sbursement For: Primary X General  Other (specify) ▶
Full Name of Payee Buying Time, LLC Date of Dissemination: 10/14/16		Date of Public Distribution/Dissemination
Mailing Address 650 Massachusetts Avenue, NW		Amount
Sulte 210  City State Z	ip Code	53000.00
1 - 7	20001	Transaction ID: SE-952374 Date of Disbursement or Obligation
Purpose of Expendituro Media Buy	Category/ Type 004	10 13 / 2016
Name of Federal Candidate	Support O	ffice Sought: House District: 00
Trump, Donald, J., ,	X Oppose	resident Senate State:
Calendar Year-To-Date Per Election for Office Sought		sbursement For: Primary X General D16 Other (specify) >
(a) SUBTOTAL of Itemized Independent Expenditures		65260.71
(a) SUBTUTAL OF RUMINESS INCEPTIONS Expenditures	······	05200.71
(b) SUBTOTAL of Unitemized Independent Expenditures		
(c) TOTAL Independent Expenditures	<b>&gt;</b>	
Under penalty of perjury I certify that the independent expenditures rewith, or at the request or suggestion of, any candidate or authorized committee) any political party committee or its agent.		
Ward, Kelly, C., . [Electronics	nily Filed  Date	10 18 2016
Signature		

PAGE 52 OF 52 FOR SE OF FORM 24/48  FEC IDENTIFICATION NUMBER V C C00000935  Date of Public Distribution/Dissemination  10 18 2016  Amount  3407.87  Transaction ID: SE-952382 Date of Distursement or Obligation  10 18 2016  Amount  Office Sought: House District: 00
PEC IDENTIFICATION NUMBER C C C00000935  S report filed on Date of Public Distribution/Dissemination  Date of Public Distribution/Dissemination  10 18 2016  Amount  3407.87  Transaction ID: SE-952382 Date of Disbursement or Obligation  10 18 2016
Date of Public Distribution/Dissemination  Date of Public Distribution/Dissemination  10 18 2016  Amount  3407.87  Transaction ID: SE-952382 Date of Disbursement or Obligation
Date of Public Distribution/Dissemination  10 18 2016  Amount  3407.87  Transaction ID: SE-952382 Date of Disbursement or Obligation
Date of Public Distribution/Dissemination  10 18 2016  Amount  3407.87  Transaction ID: SE-952382  Date of Disbursement or Obligation
Amount  3407.87  Transaction ID: SE-952382  Date of Disbursement or Obligation  10  18  2016
Amount  3407.87  Transaction ID : SE-952382  Date of Disbursement or Obligation  10  18  2016
Transaction ID : SE-952382 Date of Disbursement or Obligation 10 18 2016
Transaction ID: SE-952382 Date of Disbursement or Obligation 10 18 2016
Transaction ID: SE-952382 Date of Disbursement or Obligation 10 18 2016
Date of Disbursement or Obligation  10 18 2016
10 18 2016
ort Office Sought: House District: 00
out i cuice conduir. I Lunga Ciguict — or
ose X President Senate State:
Disbursement For: ☐ Primary 🗶 Genera 2016 ☐ Other (specify) ▶
Date of Public Distribution/Dissemination
10 18 2016
Amount
83829.00
Transaction ID : SE-952073  Date of Disbursement or Obligation
004 10 17 7 2016
port Office Sought: House District: 00
ose X President Senate State:
Disbursement For: Primary X General 2016
Disbursement For: Primary Senera
Disbursement For: ☐ Primary 🕱 General 2016 ☐ Other (specify) ▶
•

with, or at the request or suggestion of, any candidate or a party committee) any political party committee or its agent.

•					
Ward, Kelly, C., , Signature	[Electronically Filed]	Date	10	19	2016

24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)	PAGE 52 OF 60
·	FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)  DCCC  FEC (II)	DENTIFICATION NUMBER V
	C00000935
Check if 24-hour report 48-hour report New report Amends report filed on 1 4 1	, logal ( Laboration )
I Caraca Chatacian Madia ((C ::	lc Distribution/Dissemination
Mailing Address 11150 Fairfax Blvd Suite 505	20 1 2010
-	e400e.00
Fairfax VA 22030 Transaction Oato of Dish	64326.00 ID : SE-953184 ursement or Obligation
	21 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Donald J. Trump Oppose President	Senate State:
Calendar Year-To-Date Per Election for Office Sought  A369947.93  Disbursement For: 2016  Other (sp	Primary General
Buying Time, LLC Date of Dissemination: 10/25/16  Mailing Address 650 Massachusetts Avenue, NW  Amount	ic Distribution/Dissemination  25 2016
Sulte 210  City State Zip Code	62488.00
Washington DC 20001 Transaction II	D : SE-953185 ursoment or Obligation
Purpose of Expenditure Media Buy  Category/ 1 Type: 004 Type: 004	1 21 2016
Name of Federal Candidate Support Office Sought:	House District: 00
Donald J. Trump	Senate State:
Calendar Year-Tc-Date Per Election for Office Sought  Disbursoment For: 2016  Other (sp	1,7.7
(a) SUBTOTAL of Itemized Independent Expenditures	126814.00
(a) opprove of companion approve appro	and the second of the
(c) TOTAL Independent Expenditures	State of the
Under penalty of portury i certify that the Independent expenditures reported herein were not made in cooperativity, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the repoperative) only political party committee or its agent.	ion, consultation, or concert orling entity is not a political
Kelly C. Ward Oale 10 25	2016
Signature	(